

## **Comment 1 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Alejandra

Last Name: MieryTeran

Email Address: amierysteran@otaymesa.org

Affiliation: Otay Mesa Chamber of Commerce

Subject: Advanced Clean Fleet Regulations

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-acf2022-BmcCYAN0AzFSOl0.pdf'

Original File Name: Advanced Truck Regulations Position 09:22.pdf

Date and Time Comment Was Submitted: 2022-09-14 12:52:52

No Duplicates.

## **Comment 2 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Joseph  
Last Name: Sonnefeld  
Email Address: 4JOEENG@GMAIL.COM  
Affiliation:

Subject: Diesel vehical fleet  
Comment:

Have you heard of the Constitution. You can not take property without compensation so attempting to force conversion to EV vehicles without compensation is unconstitutional under the 14 amendment. Under federalism you can not force the federal agencies to do anything. Third you can not stop vehicles from other states from driving in California so if I had a big company I just move it to Arizonia or Nevada and keep doing buisness as usual because under the interstate commerce clause your regulation would have no affect.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-09-15 21:35:57

No Duplicates.

### **Comment 3 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Gurwinnder

Last Name: Mann

Email Address: Gmann481@gmail.com

Affiliation:

Subject: Advance.clean fleet

Comment:

Please don't do this one .how  
many time we change are trucks.they are so expensive  
trucks are so expensive .2010 engine shou  
engine should be enough with the drff  
deff.please don't do this

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-09-19 13:12:37

No Duplicates.

## **Comment 4 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mark

Last Name: Borges

Email Address: threen8rock@aol.com

Affiliation:

Subject: Zero emission fleet vehicles

Comment:

Semi-trucks, box trucks becoming all electric/zero emissions to operate in California is a very bad idea. The electric charging infrastructure is not present in California to accomplish this. Furthermore, there are very few semitruck manufacturers converting to electric power. They cannot travel the same or come even close to the distance of diesel powered trucks and it takes hours to charge electric vehicles, let alone electric trucks. The cost of EVERYTHING will rise and people of California will not be able to afford to live here. This will cause more people and businesses to leave the state to live and work in states without this mandate. If you want to destroy California further than it already is and destroy our economy here, then go ahead with this poor thought out mandate to electrify semitrucks. I am against this plan and think it is one of the worst ideas for this state, at least until the infrastructure is in place, price of such vehicles and technology catches up with fossil fuel vehicles.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-09-20 07:36:34

No Duplicates.

## **Comment 5 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jim

Last Name: Hilson

Email Address: HISLONV@AOL.COM

Affiliation:

Subject: Diesel truck public hearing comments

Comment:

Thank you for your time to consider my comments regarding the elimination of diesel powered trucks in California with a switchover to electric powered vehicles. To be blunt, I find the proposal to be ill conceived, naive and a total disaster in the making. The proposal lacks common sense and logic while totally ignoring a simple fact. Nobody is talking about how the batteries associated with these vehicles are going to be charged. Nobody is talking about the time required to charge them and the real costs that would need to be covered. It isn't just the electricity needed, it is the time involved. Speaking of the electricity, One of Gavin Newsom's real failures is the condition of the power grid in California. The CPUC is right there with him as is the CARB. We are being asked to conserve on hot days due to a lack of power available to the grid. How much power will be needed to charge a single truck? How many trucks will need charging daily and how long will they run before needing to be recharged? How much power does this all add up to? Where would it come from? How do you deal with express trucking requirements where two drivers split time to get something from point a to point b as fast as possible? How many charging stations will be required to replace gas pumps with a short turnover time to charge all of the trucks attempting to keep on trucking? What happens when a snowstorm closes one of the mountain passes and the truck's batteries are drained? What about the severely decreased battery life in cold weather? You can't control trucks in other states so what do you do when one shows up at the border into the state? Deny them entry? Have them no longer deliver here?

Until these questions have solid answers any attempt to further make a mess of the transportation situation in California by mandating electric trucks and banning diesels needs to be put on hold and the mandates now suggested to be diesel free by a date need to be dropped until such time as it is really feasible to meet those goals. If the Governor wants diesel free electric powered heavy freight transportation then he needs to get the ball rolling on solutions to all of the questions I asked above and the carb needs to stop the insanity of declaring things that will either not be possible to meet or will cause great economic damage to both California and the entire country because they aren't met.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-09-20 18:22:09

No Duplicates.

## **Comment 6 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jorge

Last Name: Lopez

Email Address: Exodus411.jl@gmail.com

Affiliation: Owner operator going out of business

Subject: Please help us survive your regulations

Comment:

Thanks for letting us have an opinion that is not going to count on your decision of clean air regulations. I agree that we need to make things better for our environment but the problem is that you guys are not ready for this changes. I will buy an electric vehicle when (you provide the electric charging station needed. Talk to the truck manufacturer and electric truck only go for 150 miles range. It's impossible for a truck driver to have something so unreliable for delivery of your product. Right now it's not the time for electric vehicles and CNG that are not zero emissions stop lying to the public to get votes. You are not going to have trucks to deliver your food. Get the technology that we need and i be ready for it when you get it done. WE ARE NOT READY FOR THIS ENFORCEMENT. A charging station for a truck is about \$40.000 dollars and the cost of an electric truck range between \$500000 to 400000 dollars . We're parking in private property renting a parking space how do we charge a truck overnight??? You are going to put a lot of trucks out of business. The shortage of trucks is going to get worse. If I need to move away from CA we're going to do it to bring food to our families. I hope when the next pandemic comes around you have enough trucks to show your appreciation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-09-21 10:51:56

No Duplicates.

## **Comment 7 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Alexander  
Last Name: Amort  
Email Address: aamort@cascade-env.com  
Affiliation: Cascade Environmental, LLC

Subject: Clean Fleet  
Comment:

Good morning, please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-acf2022-UjFUM1QnWGkGXwBj.pdf'

Original File Name: CARB Clean Fleet Comments .pdf

Date and Time Comment Was Submitted: 2022-09-22 07:41:26

No Duplicates.



## **Comment 8 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Josh  
Last Name: Grodin  
Email Address: josh.grodin@penske.com  
Affiliation: Penske

Subject: Penske - Comments on the Proposed Advanced Clean Fleets Regulation  
Comment:

Please find the attached comment letter from Penske Truck  
Leasing (Penske) re: the Proposed Advanced Clean Fleets Regulation  
in advance of the October hearing.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-acf2022-  
UiJRMII9BycEaQls.pdf'

Original File Name: Penske ACF Comment Letter - September 2022.pdf

Date and Time Comment Was Submitted: 2022-09-23 06:29:40

No Duplicates.

## **Comment 9 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jim

Last Name: G

Email Address: jim3481@msn.com

Affiliation:

Subject: CARB truck regulation

Comment:

Hi, I have the pleasure to work in california all these 10 years as an owner operator but in 2020 we suffer a pandemic we loss some relatives due covid, at least we expect some human caritative from you, giving an extension for the truck engine with 2007-2009, but I think its not going to happen so my friends are leaving to another state to work as an owner op., others are getting retired, others are going to do a different kind of work. did you expect it's a good idea to follows these reagulation now when the cost of the trucks are very expensive? please step ground, come to the port and ask the drivers, we are all agree to clean the air pollution but it have to be fair for everybody working in the trucking industry.  
Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-09-24 13:24:11

No Duplicates.

## **Comment 10 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: ROGER

Last Name: ELLIS

Email Address: rre913@gmail.com

Affiliation: Attorney at Law (Retired)

Subject: DIESEL TRUCK BAN

Comment:

Shirin Barfjani,  
Matthew Botill,  
Brian Moore,

I read a Los Angeles Times article today stating that you're voting next month on banning diesel trucks in California.

First, I understand there would be less pollutants in the air but have you considered:

AT WHAT  
PRICE?

What if there aren't enough zero emission trucks? How do you plan on forcing truckers to stop the transport of food to 40 million Californians?

What will happen to grocery prices alone if there are thousands and thousands less trucks transporting food?

How do you plan on forcing manufacturers to build large (sometimes refrigerated) trucks with batteries that can run for 10 hours fully loaded? A recent article shows the new EV Ford F-150 can't even tow another car on a trailer 100 miles without needing a complete charge! <https://www.breitbart.com/tech/2022/09/27/complete-and-total-disaster-ford-electric-truck-utterly-fails-youtubers-towing-test/>

How do you plan on forcing truckers to purchase "zero emission" vehicles if such vehicles are not affordable, practical or even available?

Have you thought about the impact of children forced to mine thousands of tons of lithium, cobalt and other rare minerals in Africa and other 3rd world countries for tons and tons of battery materials required for these trucks?

How do you plan on charging  
400,000 electric trucks on a grid that today can't handle the  
current peak demand with millions less EV cars than will be  
"required" by 2035.

Today, we rely heavily on China  
for "zero emission" products (wind, solar, battery  
components). Considering they are also building nuclear weapons and  
threatening free countries, is it a good idea to force California  
to become even more dependent on a Communist country?

Have you checked with attorneys  
for an opinion to see if the Commerce Clause of the U.S.  
Constitution even allows California to so severely impact  
interstate commerce, especially by an unelected  
board?

An idea this big, affecting  
just about everyone in the U.S. should be brought up and debated by  
the state legislature, if not the U.S.  
Congress.

These are just a few important  
questions to which I hope you have some answers.

I look forward to hearing from  
you.

Very truly,

Roger Ellis,  
Attorney at Law  
(Retired)

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-09-27 13:44:56

No Duplicates.

## **Comment 11 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Paul

Last Name: Raab

Email Address: praab@vcsar3.org

Affiliation:

Subject: Who is doing the math - power dilemma

Comment:

Ok, let us look at the other side of the equation where electric motors requires an exponential increase in current under load. from Wikipedia "the Tesla Model S requires 10 kW (14 hp) at 70 mph (110 km/h), and 31 kW (42 hp) at 100 mph (160 km/h) "

Just a 40% increase in speed requires 3 times more power and cuts the range to 1/3 the distance.

If you try putting a trailer behind a Tesla, range drops from 300 miles to 75 miles or 1/4 of the unloaded range !!!

Yes Teslas cars are very efficient only needing a mere 14 horse power to get down the road.

Yes teslas can deliver lots of HP (283) but it will deplete its 62 KWh battery in just 10 minutes, 10 miles and over heat.

Were going back to the model T ford with 22 HP?

This is fine for the most part, since they are used by single drivers commuting to work at 14 HP.

Now you want to kill desil semis ??

Long haul semi's will require huge batteries to go 900 miles, 80,000 lbs (40 tons), 15 hours at 60 mph.

It will need a 3.1 million Watt hour, 54,000 lbs (27 tons) battery which costs \$600,000.00

The truck which weighs 25,000 lbs (13 tons) will only be able to carry a useless payload of 1,000 lbs (1/2 ton).

This is why you do not see any electric semis on the road. totally impractical and expensive.

Even medium range semi's would require a battery that weighs half the payload.

A semi would need a multi-megawatt charger.

No one seems to be doing the math or making a plan to really build the infrastructure necessary to provide the power necessary to make this workable.

This requires 10 to 100 times more electricity and distribution than california has.

I do not see anything being built...

Most homes are "allocated" 2.5 to 5 Kva each from the pole tranformer.

Homes with natural gas get the lower and all electric get the higher.

You may have 10 to 16 homes tied to one pole/underground transformer.

The ten hour charger for one E-vehicle needs 8 Kva! Two EV's needs 16 Kva!!

25 Kva transformer can only support 3 chargers MAX (nothing else).

37.5 KVa can support 4 chargers MAX (nothing else).

50 Kva can support 6 chargers MAX (nothing else).

There maybe an exploding transformer near you soon, due to your poor planing.

Every neighborhood will need a 10 fold increase in the number/size of transformers alone.

Now you need bigger wires too and 10 times more power plants!

What army is building and installing the 7 million, 250kva distribution transformers needed.

13,000,000 house holds X 8,000 watts X 2 EV in every driveway = 208,000,000,000 watts.

now add in 200,000 fast chargers needing 100 kva transformers each 20,000,000,000 watts.

now add in 50,000 mega-chargers needing 1,000 Kva transformers each 50,000,000,000 watts.

That is 278 gigawatts and we struggled last summer with 55 gigawatts.

We have 1,500 power plants in California.

Where will you build 10,000 plus more power plants? at what cost ?

You need to build 1000 new power plants every year for ten years.

I do not see this in your plans.

Oh you are also turning off natural gas in homes for heating and cooking to go to electric heat.

Did you do the math there too?

However you want to slice and dice the numbers, there is a big power hole that needs to be filled.

Forcing only EV-car/turck/semi sales in 2035 is not going to work without massive power upgrades starting now.

The internal combustion engine wins the loaded power and range battle at this time.

No, Hydgron technology and infastructure is too far off and has many issues.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-09-27 15:33:43

No Duplicates.

## **Comment 12 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jarrett

Last Name: Stoltzfus

Email Address: jstoltzfus@proterra.com

Affiliation:

Subject: Proterra Comments on ACF Regulation

Comment:

See attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-acf2022-UiIHc1M9BCMDYANx.pdf'

Original File Name: Proterra ACF Letter\_Sep\_22.pdf

Date and Time Comment Was Submitted: 2022-09-27 15:21:00

No Duplicates.



## **Comment 13 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jon

Last Name: Zamorano

Email Address: jzamorano@bbccsd.org

Affiliation: Big Bear City Community Service District

Subject: Clean Fleets Regulation

Comment:

Hoping there is discussion regarding the impact this will have on not just fleets but the retro-fitting of buildings. I live in a small community and our local electric provider is not even set up to handle the draw that this bill will impose on schools and local government agencies. It will cause a trickle down effecting everyone. As mentioned earlier while the move to electric is substantial in purchasing a truck it doesn't stop there. In order to charge these trucks every building will need upgrades in order to charge these trucks costing hundreds of thousands of dollars. Where will this money come from? Taxpayers, affecting each person in every community. I am hoping it isn't too late to reconsider this bill.

Thank you,  
Jon Zamorano  
Solid Waste Dept.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-09-28 10:53:01

No Duplicates.

## **Comment 14 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Tenille

Last Name: Otero

Email Address: totero@otaywater.gov

Affiliation:

Subject: Otay Water District Comments on the Proposed Advanced Clean Fleets Regulation  
Comment:

Thank you for the opportunity to provide public comments to the California Air Resources Board (CARB) in response to the recent Draft Regulatory Language on Public Fleet Requirements (Draft Rule), and the May 4, 2022 Advanced Clean Fleets Regulation public workshop. We appreciate the work that CARB staff has done to consider and incorporate stakeholder input in the draft regulatory language, and we encourage CARB staff to continue these constructive efforts to develop a feasible, practical, and effective Draft Rule as the State moves towards ambitious goals to maximize Zero Emission Vehicles (ZEVs), and Near-Zero Emission Vehicles (NZEVs) in the state's fleets. Please see attached comment letter from the Otay Water District.  
Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-acf2022-BWRWNAB3AjBWPglq.pdf'

Original File Name: Advanced Clean Fleets Formal Comment Letter-Sept2022\_FINAL\_JoseMartinez.pdf

Date and Time Comment Was Submitted: 2022-09-28 13:46:50

No Duplicates.

## **Comment 15 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Elisabeth

Last Name: de Jong

Email Address: edejong@scppa.org

Affiliation: SCPPA

Subject: Joint POU Key Concerns with ACF Rule

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-acf2022-UzIXPgZuBDkDcQJd.pdf'

Original File Name: Joint POU Key Concerns with ACF.final.9.27.pdf

Date and Time Comment Was Submitted: 2022-09-29 16:47:25

No Duplicates.

## **Comment 16 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 17 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Thomas  
Last Name: Gleason  
Email Address: tgleason.drt@gmail.com  
Affiliation:

Subject: Fix the ACF  
Comment:

Please see attached comment

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-acf2022-VmdSOwF4VVkQIm0D.pdf'

Original File Name: Fix the ACF (acf2022).pdf

Date and Time Comment Was Submitted: 2022-10-05 15:41:54

No Duplicates.

## **Comment 18 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jeff  
Last Name: Becker  
Email Address: jbecker@trilogymgt.com  
Affiliation:

Subject: ACF  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-acf2022-UDFSN1cwBHkLfQFl.pdf'

Original File Name: ACF.pdf

Date and Time Comment Was Submitted: 2022-10-05 16:55:23

No Duplicates.

## **Comment 19 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mandie

Last Name: Spinelli

Email Address: Mandielee\_07@yahoo.com

Affiliation:

Subject: Companies unable to keep up, big waste, not proven to benefit climate/health

Comment:

Small company's current situation:

2 trucks, 2 drivers (husband and wife business) Year 2010 truck no longer able to register due to new CARB (California Air Resources Board) law (effective October 2022).

Truck is off the road/husband's job lost.

The truck was used in the central valley hauling metal/heavy equipment to be RECYCLED. Truck runs quiet as a car, and no black smoke from the exhaust.

Called Progressive insurance (Oct. 2022) to cancel since can no longer drive on California roads. Progressive states can't un insure until the truck is sold. (Thankfully called trucking broker who was able to cancel!) Can you imagine being forced to pay insurance on a truck you can't drive/no income!?

Truck was bought in 2009 to replace 2000 truck due to emissions law for 2010.

New truck cost: \$200,000 with low inventory/wait time to replace old truck.

New law is trying to pass stating zero emissions (all electric trucks).

Where are the electric trucks now?

CA unable to support electricity needs.

Technology unable to support distance/charging/power needs.

TRUCK DRIVERS ARE BEING SILENT...

Economy is not strong.

Society has not recovered recent problems.

Thousands of jobs/businesses to be lost throughout California.

Protecting the climate is great, and this truck was a step towards cleaner air.

This truck is only 12 years old.

The new trucks being made today will only be legal for a short time as well (before all electric trucks enforced).

So much waste...millions of dollars for large companies to keep up...Government is exempt (of course). Lots of tax money being made on new truck sales.

We need more time. Keep these trucks working and find a better solution!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-05 20:58:56

No Duplicates.



## Comment 20 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.

First Name: Paul

Last Name: Raab

Email Address: praab@vcsar3.org

Affiliation:

Subject: ZEV requirement based on wrong premise

Comment:

CO2 has about 0.0004% control over our environment's temperature and that is being generous. Our planet is getting hotter, but CO2 is very LIKLEY NOT causing this climate change. In fact, the IPCC admits that the surface temperature of the OCEANS is the main culprit of global warming. And that all the GHG gases in the atmosphere have only contributed to just 1% to the global heating problem. CO2 is a fractional percentage of global warming. If we were to stop burning all fossil fuels and go to "green" energy only, we would NOT stop global warming. Even the IPCC admits that eliminating carbon emissions will not fix the climate problem. So go get a copy of The IPCC Summary for Policy Makers and you will find these statements that you politicians have missed. From IPCC SPM Document A 4.2

"Ocean warming accounted for 91% of the heating in the climate system, with land warming, ice loss and atmospheric warming accounting for about 5%, 3% and 1%, respectively (high confidence)"  
Yes. It is kind of hidden in there. "Atmospheric (all GHG's) warming accounting for only 1% of our temperature rise"  
And here is where they admit that removing man made CO2 will not fix the problem, if you understand that CO2 is a 0.0004% player, CO2 cannot reduce the ocean temperature enough to make any difference. From IPCC SPM document D 1.6

"If global net negative CO2 emissions were to be achieved and be sustained, the global CO2-induced surface temperature increase would be gradually reversed but other climate changes would continue in their current direction for decades to millennia (high confidence). For instance, it would take several centuries to millennia for global mean sea level to reverse course even under large net negative CO2 emissions (high confidence)." How is it that human-caused CO2 could heat the upper layer of the oceans in 60 years, but it will take centuries

for it to cool? All  
of mankind's emissions cannot increase the heat of the upper  
layer of the oceans, which covers two thirds of the earth.  
So, to fix our hot climate, we have to cool  
the upper surface of the oceans, so you are not addressing the real  
cause of the climate problem.  
The main flaw of these Climate politicians is  
that they only talk about global average temperature. By itself,  
average temperature is meaningless. You need to open your eyes,  
take off the blinders, and look at the bigger picture.  
Our global temperatures ranges from -80 F to  
+120 F which is a 200 F degree swing.  
200 F degrees divided by a 2 F degree change  
equals a 1% shift.  
This means instead of being -80F, it only got  
to -78F in Antarctica.  
Instead of Death Valley being +120F, it got to  
+122F.  
There is still a huge swing in min and max  
temperatures over the seasons  
A 1% change does not destroy the world. The  
artic still freezes over every winter.  
Thermal radiative forcing is fiction. This is  
where they forgot about the inverse square law.  
None of the facts support CO2 as being the  
main actor in the climate change disaster fairy tale.  
Declaring that it is "Likely" 113  
times in the SPM document is not scientific proof.  
CO2 has been wrongly villainized as a climate  
threat for political gain.  
CO2 makes plants happy. Plant more trees to  
scrub the CO2 from the earth.  
So why are we destroying our state and country  
by forcing everyone to immediately go to a zero-carbon footprint  
when it will not lower the temperature of our  
climate one bit.

A 50/50 solution would be better at this time.  
Electric cars and trucks are great for short trips with light  
loads. Gas cars and trucks are necessary for the long haul and  
heavy loads, since EV batteries would be too big and heavy to be  
practical.  
We need both gas and electric vehicles, please  
just let the free market do what it does best. This is the land of  
the free and you are over stepping a critical boundary without real  
cause.

No law needs to be mandated,  
rather a strong recommendation would be better.  
Please, rescind all of your  
Zero mandated laws against fossil fuels as they are founded upon a  
false premise.

Do not forget to build 1,000 natural gas power  
plants a year, and every year, for the next ten plus years to feed  
all those hungry EV's.

Not a scientist, just an Engineer. The math  
does not add up.  
Thank you  
Paul Raab

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-05 22:33:10

No Duplicates.

## **Comment 21 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Alessandra  
Last Name: Magnasco  
Email Address: alessandra@cfca.energy  
Affiliation: California Fuels & Convenience Alliance

Subject: Advanced Clean Fleets Regulation  
Comment:

Please see attached file

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-acf2022-VTQHZVYhVWcKYgBj.pdf'

Original File Name: Advanced Clean Fleets Regulation.pdf

Date and Time Comment Was Submitted: 2022-10-06 11:27:17

No Duplicates.

## **Comment 22 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Tim  
Last Name: Cromartie  
Email Address: tim@environmentaljusticeleague.org  
Affiliation: Executive Director

Subject: Comment Letter re: Advanced Clean Fleet Rulemaking  
Comment:

Good Morning,  
Please find attached the comment letter of the Environmental  
Justice League regarding the Advanced Clean Fleet Rulemaking.  
Thank you.  
Tim Cromartie, Executive Director

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-acf2022-BmMBbVc6Ag5WPANm.pdf'

Original File Name: EJL Letter to CARB\_Advanced Clean Fleet Rulemaking.pdf

Date and Time Comment Was Submitted: 2022-10-06 11:38:15

No Duplicates.

## **Comment 23 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Cory

Last Name: Peters

Email Address: cpeters@bestdrayage.com

Affiliation: Best Drayage

Subject: Proposed ACF - Drayage Truck 1/1/2024 Requirement

Comment:

I am writing you today to urge you to remove the 1/1/2024 requirement that any drayage truck entering a port facility for the first time be Zero Emission. As a trucking company based in the Central Valley, there is no Zero Emission equipment available today that would allow us to make it from our customers to the Port of Oakland and back without re-charging en route. That is not practical, as the quickest charge available today is at least 6 hours. It is hard enough for drivers to make it between the Central Valley and the Port of Oakland and back within legal driving hours, adding the charging time will make it impossible. Until the technology is available, we should not be forced to purchase something that does not exist.

The 1/1/2024 registration requirement is the most glaring issue we have seen in your proposal, especially for those fleets who regularly purchase new trucks. Other issues include not having enough public charging infrastructure and the weights of zero emission trucks.

We have attended a few calls with CARB staff who seemed shocked to learn that most trucks rely on public fueling now. Asking fleets to install

their own charging infrastructure is not practical, as the majority of our industry doesn't have their own fueling stations now, trucks fuel on the road because that is where they need it most. The weight of zero-emission trucks is also a concern. With the lightest zero-emission Class 8 trucks averaging more than 12,000 lbs. heavier than their diesel counterparts, shippers will be forced to slash loads by up to 30%. This will have a dramatic impact on the costs for shippers, especially those in the Central Valley.

While we agree there is a need for cleaner emission vehicles, until that technology is there for all Class 8 vehicles, it is harmful to put in regulations like this one. There are many more

practical applications that can go to zero-emission vehicles with current technology.

Perhaps a review of what an actual drayage truck is would be beneficial for your staff?

During presentations, it seems as if they believe all drayage trucks just work within the port complexes. In reality, there is no difference between a day-cab drayage truck that goes between the ports and the Central Valley (or further) and thousands of other Class 8 trucks that your proposal gives much more time to

transition to zero emission.

Thank you for your time.

Cory Peters  
Chief Financial Officer  
Best Drayage

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-06 13:42:28

No Duplicates.

## **Comment 24 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Steven

Last Name: Villata

Email Address: stevev@grunners.com

Affiliation: none

Subject: Please do not rush this.. do NOT pass this regulation yet!!

Comment:

I am pro green, pro electric vehicle and i do think the government has an important role to play in implementing legislation to help move toward low - zero emissions alternatives.       HOWEVER....

the time frame proposed in this regulation simply is not workable at this time.   Much of the california exports moving out of its ports are coming from areas that are a fairly significant distance from the ports and there currently is not even any commercially available zero emissions trucks that could make those moves.   Its not realistic.   The idea is great.. and i think we will get there.. and its good to be ambitious and push this, but there needs to be some realistic understanding of the logistics and the current technology and and available options for zero emissions trucks.

We need to make changes and we need to push   to make these changes as soon as we can.. but please. realize the proposed regulation is too aggressive and not realistic.. keep the idea there, but the time frame is too short for ZERO emissions when those vehicles dont even exist yet for the logistic situation we have.

Please tap the brakes a bit.. slow down and take a better look and come up with a better, more realistic plan...   not this

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-06 13:42:16

No Duplicates.



## **Comment 25 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Greg  
Last Name: Wright  
Email Address: gwright@bestdrayage.com  
Affiliation: Best Drayage

Subject: California Air Resources Board - Advanced Clean Fleets Regulation  
Comment:

To Whom This May Concern,

I am hoping to shed some quick thoughts on the newly proposed law in place by CARB. This law will severely impact the trucking industry in a negative way. Our drayage company works with drivers all throughout the valley (Fresno) to the Bay Area.

Unfortunately, there is no Zero Emission truck that can do what we do. Even the best ones on the market have a limited range that wouldn't even allow us to do a round-trip between Manteca and Oakland without having to re-charge for numerous hours. Those trucks also weigh 12,000+ more than current trucks. It would be impossible to run between Oakland/Fresno.

Any driver that will need to do repairs after the proposed 1/1/24 date will need to get a brand new electric truck and either put this driver out of work due to the financial cost of the truck, or severely burden the driver and their family with an exponential cost.

Please take these thoughts into consideration. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-06 13:56:57

No Duplicates.

## **Comment 26 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jana

Last Name: W

Email Address: jnorcal3@yahoo.com

Affiliation:

Subject: CARB ACF

Comment:

Our economy is already highly problematic, unpredictable and extensive. Adding the new measure will be devastating the the timely movement of our import and exports. There won't be enough trucks on the ground that can move the sheer volume of containers if the new measure is implemented. We still cannot catch up from Covid congestion in the ports with the current diesel trucks as less and less people want to drive trucks nowadays. Owner operators and trucking companies are already being eaten alive by the amount of regulations and fee's that they face in California. In an already over regulated market, this will make even more truckers leave the field and does not promote or entice new truckers into it. In high electrical usage periods, when truckers cannot charge their batteries, who's going to move the product to get food on our tables. I'm not against green energy but this will be detrimental across the state and the country.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-06 13:53:34

No Duplicates.

## **Comment 27 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Michael

Last Name: Tooley

Email Address: michael@tooleyoil.com

Affiliation:

Subject: Title 13. Public Hearing to Consider Proposed Advanced Clean Fleets Regulation  
Comment:

Please see the attached letter in opposition to the Proposed Advanced Clean Fleets Regulation. Thanks you and have a nice day.

Michael

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-acf2022-AHMHagNvBAhXMgk9.pdf'

Original File Name: SKM\_C45822100614270.pdf

Date and Time Comment Was Submitted: 2022-10-06 14:18:05

No Duplicates.

## **Comment 28 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: William

Last Name: Mayo

Email Address: will@goldenstatefreight.com

Affiliation:

Subject: CARB Clean Fleets Regulation

Comment:

What the board is considering would be devastating for the trucking industry in CA and the economy as a whole. Most trucking companies and owner-operators don't buy brand new trucks now due to costs of doing business in CA so how can they be forced to spend hundreds of thousands of dollars on vehicle and then have to spend even more money to install chargers on their property? In addition will PG&E want trucking companies to pay for upgrading the grid to support all of these charging stations? If CA really wanted to drive more people and industry out of CA then this is the type of legislation they should pass. I guess it makes no difference what all of the mining for rare earth minerals does to the land and the people in a third world country as long as it makes CA progressives feel good about driving a battery powered car. How is the state supposed to support all of these semi trucks charging at night time when we can barely keep the power on during the warmest days of summer? There is zero logic behind this or any CARB regulation and all comes down to feel-goodism. If this does pass then good riddance to this state and I hope more people leave for states that support small business and individual freedom.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-06 14:14:01

No Duplicates.

## **Comment 29 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Shane

Last Name: Gusman

Email Address: gusman@bglaw.org

Affiliation: California Teamsters

Subject: Teamster & California Labor Federation ACF Comments

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-acf2022-Uz9SMVYjBCMBYgd1.pdf'

Original File Name: Letter to CA Air Resources Board re Support for a Stronger Advanced Clean Fleets Rule w CA Teamsters.pdf

Date and Time Comment Was Submitted: 2022-10-06 15:55:46

No Duplicates.

## **Comment 30 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Faustino

Last Name: Arenas

Email Address: F.arenas89@yahoo.com

Affiliation:

Subject: 2018 trucks or newer

Comment:

How can carb pass a law so fast when there are no electric trucks on the market. Have any need one seen any electric charging station for trucks? Around the 559 or 209 area even down in the 661 or 916 area? How does carb for small fleets to stay in business and feed our families? Theres no way for any small companies to keep up with big corperation on buyin electric.the central valley is mostly of agriculture is produce year round. So most of tge driver are from here. Please help us keep on feeding our families and maintain our way of life and no implant these regulation so fast. We need time to look at options. The loads do not pay well as they did with these brokers always payin us cheap rates and deisel riseing how can we compete with bigger payment for the elctric truck? It will put so many pll out of busniess

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-07 05:24:04

No Duplicates.

## **Comment 31 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Dan  
Last Name: Maurer  
Email Address: dan@thesoico.com  
Affiliation:

Subject: ACF Regulation  
Comment:

To Whom it May Concern,

I am writing as a concerned importer. I went through your new proposals and find them excessive. We as importers are suffering from high fuel costs, duties and ridiculous container fees due to the pandemic. The shipping fees are now starting to come down. The issue is how do you expect trucking companies, independent drivers to purchase NEW vehicles that dont exist? As well as in just a couple of years to start purchasing all new equipment? This just isnt feasible for anyone. Please re consider what you are asking and lets use some common sense. Thank you Dan Maurer

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-07 07:00:27

No Duplicates.

## Comment 32 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.

First Name: Marcus

Last Name: Vierra

Email Address: mvierra@bestdrayage.com

Affiliation:

Subject: Advanced Clean Fleet - Comments

Comment:

The Advanced Clean Fleet rule is too ambitious for the reality of the technology and infrastructure of 2024 for Port Drayage. Below I will highlight the most urgent issues with this bill facing the companies I work with directly every day, which are drayage trucking companies that run from the Port of Oakland to the Central Valley:

1.

There is no public charging infrastructure currently in place to charge these vehicles. Many drayage trucking companies own 1-5 trucks, and often do not own the yards they park the trucks in. They have no option for private charging, either due to cost or simply because they do not own land to do so. There is no way there will be adequate public charging available for all of the drayage trucks in 14 months.

2.

Not allowing diesel replacement trucks beyond 2024 puts too much uncertainty in this industry. Right now many drayage drivers are being forced out of perfectly viable trucks because they have 2010 or older engines. Used truck prices are at an all time high. However, with this rule, if a company buys a 2019 truck (which should be able to be used until 2032), and it gets totaled on January 2, 2024 even if no fault of the driver, they cannot replace this truck except with an electric truck that is triple the price and not viable for this industry?

3.

Current electric trucks do not provide the range needed to go from the central valley to Oakland and back home. This will mean drivers that currently do these runs in 10-14 hours will not be able to do the same jobs they do now and still adhere to legal hours of service requirements. It should not be a 2-day trip from Fresno to Oakland and back, but it will be in an electric truck that does not have the range to make it. This will cause an influx of drivers to no longer want to be in this industry which currently allows them to be home with family each night.

4.

Cargo weight issues due to these much heavier trucks will severely harm agricultural product exporters in the central valley, and require more trucks on the



road to haul the same amount of product. Right now, electric trucks are 12,000lbs heavier than the average truck we work with. That means almond shippers will only be able to put 33,000lbs of product into a container instead of 45,000lbs due to the maximum gross weight still remaining 80,000lbs.

There will be a need for 25% more trucks on the road each day, not to mention the explosion of costs due to this and adding to the total number of containers needing to be exported on container ships.

Are electric trucks the future of the drayage industry? Maybe. But this rule is way too early based on the reality of the technology and infrastructure that currently exists.

What this will do is cause a true crisis at the ports for trucking companies, for ag exporters in the central valley, and for a huge number of hard working families that rely on these jobs for their survival. 2035

might be a more realistic start date for these rules and regulations, once the technology has caught up with the ambitions of CARB. Drayage should not be among the first industries targeted by these rules, or else you risk catastrophic supply chain issues that directly impact California businesses, and ultimately all California residents.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-07 08:20:38

No Duplicates.

## **Comment 33 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Courtney  
Last Name: Roche Jr.  
Email Address: Courtney@rocheoil.com  
Affiliation:

Subject: Opposition letter to Advanced Clean Fleet Regulation  
Comment:

Hello,

Please see attached.

Thank you!

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-acf2022-VCYCawNhVW5RMgdY.docx'

Original File Name: Roche Oil - Advanced Clean Fleet Opposition.docx

Date and Time Comment Was Submitted: 2022-10-07 08:58:29

No Duplicates.

## **Comment 34 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jeff

Last Name: Cox

Email Address: jcox@bestdrayage.com

Affiliation: Best Drayage

Subject: Proposed ACF-Drayage Truck 1/1/24 Requirement

Comment:

Thank you for giving the public the opportunity to portray their thoughts on the recent ACF proposal. There are a few issues in the proposal, first and foremost, I strongly urge you to remove the 1/1/24 requirement on drayage trucks entering a California port facility for the first time to be Zero Emission. Best Drayage is a trucking company based in the Central Valley of California focusing on container drayage to the Port of Oakland. To date, there is no Zero Emission equipment available that would allow us the opportunity to service our customers' needs without re-charging in route. Our average daily haul ranges from 200-400 miles round-trip. This just isn't feasible with the quickest charge currently available taking 5-6 hours. Currently, drivers are able to complete their workday within their legal driving hours, adding a 5-6 hour charge to their day would make servicing the Central Valley impossible for any drayage provider to do legally.

Getting the cart before the horse isn't going to help matters by forcing the purchase of a vehicle that doesn't exist today. This is both impractical and again, impossible to comply with. Rationally, this should be tabled until the technology is available. I'm going to focus on the 1/1/24 registration requirement, this is what sticks out to me most. It's common practice for fleets to upgrade and purchase new vehicles in our market, one simply cannot upgrade their fleet if their isn't anything to replace your old fleet with.

Another big concern is the public charging infrastructure, where is it, and will there be enough? Logically, it's very unrealistic to think we can fast forward that as well to meet a 1/1/24 deadline to service the entire state. The vast majority of the trucking community fuels at public fuel stations, not at their own sites. Therefore, public charging stations would be a necessity to have in route, off the major highways/corridors, just like we see now. The weight of zero-emission trucks is also a concern, with the lightest zero emission truck averaging 12,000-12,500 lbs. heavier than a current diesel truck. This will tie the hands of all shippers and consignees that are shipping and receiving freight in California to drastically reduce cargo weights which will result in dramatic cost shifts. Especially, those providing dried fruit and nuts that are based here in the Central Valley feeding our entire world, not just our state.

In closing, I don't deny the need for cleaner emission vehicles but until that technology is accessible for all Class 8 vehicles I urge you to postpone this

until the infrastructure is there to make it achievable. I hope you take strong consideration into the impact and harm this regulation will pose on the drayage industry if passed prematurely. We've been on a few calls with the CARB staff and I believe the perception is drayage trucks only operate within the port complexes and are far different than other Class 8 vehicles. That's not the case, as I previously mentioned, our average length of haul ranges from 200-400 miles round-trip. There's really no difference between a "drayage" truck servicing the Central Valley and the many thousands of Class 8 trucks that have much more time to make the transition to Zero Emission.

Again, thank you for allowing us the opportunity to speak freely and trust you will allow the time for due diligence and consider moving your marker back to a much more reasonable time frame.

Jeff

Cox-President

Best Drayage

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-07 09:08:08

No Duplicates.

## **Comment 35 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Chris

Last Name: Rodriguez

Email Address: crodriguez@bestdrayage.com

Affiliation:

Subject: California Air Resources Board - Advanced Clean Fleets Regulation - HELP NEEDED

Comment:

This new law will be devastating to the trucking community, no doubt about it. California is the nation's largest economy and this is going directly effect this in a negative way. Agriculture surrounds the Central Valley of California, from almonds to pistachios to citris, California is filled with product that needs to be shipped in and out of the ports of Oakland. This new law is aiming to put trucks on the road that are heavier than the average diesel truck today, that will also require charging at stations California is not yet equipped for. Where are these charging stations going be placed at in Oakland? There is no space for containers right now, there is no parking for trucks available, so where are these going be installed? How long is it going take for these trucks to charge? Congestion in the terminals is at its peak right now so this will do nothing but make it worse. The delay in product getting shipped and received daily will become overwhelming and one of California's biggest industries is facing devastation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-07 09:21:18

No Duplicates.

## **Comment 36 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Juanita

Last Name: Morones

Email Address: Jmorones@bestdrayage.com

Affiliation:

Subject: Advanced Clean Fleets Regulation is bad for the Industry

Comment:

Good morning,

As the trucking/drayage continues to struggle with the many changes, cost and new regulations being made up daily, this is one of the biggest concerns. Being a part of the drayage industry, we and our drivers cannot afford to purchase new trucks as they are too expensive. There are no charging stations near or around the terminal and if there were just think of the chaos and crowd this cause at the already crowded terminals. The distance it takes our drivers to make 1 complete move from terminal to customer and back, would require our drivers to stop and charge multiple times causing more delays and the possibility of missing port cuts, customer and terminal appointments. The weight of electric trucks are far more heavier which would lesson the gross cargo weight of what our drivers can haul, forcing our customers cut product and having to ship in mulptile containers thus losing any kind of profit which is already thin as it is. Look at the people who will be suffering. We understand climate change is huge and we ALL want a better environment but we are not ready for this. It will only make matters worse.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-07 09:50:11

No Duplicates.

## **Comment 37 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jeremy

Last Name: Vannest

Email Address: Vannesttrucking@gmail.Com

Affiliation: Vannest Trucking Inc

Subject: (CARB) seaport regulations proposal

Comment:

To whom it may concern, my name is Jeremy Vannest owner of Vannest trucking Inc. out of Hilmar, California and my concerns regarding the new carb regulations for seaport and Intermodal in California are very disturbing because I know that I am a small business owner and will not be able to continue with my business due to costs to upgrade to a zero emissions vehicle semi truck. It was always my dream to become an owner operator. My journey started in 2014 when I first got my class a license. I worked at a propane company for a few years then I hauled milk tankers for more experience and then that's when I started getting into the Seaport , I did that for approximately one year to get to see port experience and then I cashed out my retirement and sold several vehicles and ATVs off-road four wheelers to gain the money to purchase a truck to start my dream job as being an owner operator, and to work Monday through Friday and support a good life for my family. Now that this new regulation is coming into affect it is going to be really hard to keep going , your decision to do this to millions of truck drivers in California. It is going to hurt everybody severely and I pray and hope that you will not consider moving forward with this proposal. Thank you and have a blessed day.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-07 10:58:18

No Duplicates.

## **Comment 38 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Leslee

Last Name: Baird

Email Address: lbaird@lakeviewpetroleum.com

Affiliation:

Subject: Advanced Clean Fleets Regulation

Comment:

Please see the attachment

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-acf2022-AWNdOgdvVXQBYwNc.docx'

Original File Name: Baird\_ACF.docx

Date and Time Comment Was Submitted: 2022-10-07 11:08:44

No Duplicates.



## **Comment 39 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Patrick  
Last Name: McNeece  
Email Address: patrick@mcneecebros.com  
Affiliation: McNeece Bros.

Subject: Advance Clean Regulation  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-acf2022-USZVO1M9UG9QMwJx.docx'

Original File Name: WHOLESALE-RETAIL - CARB Advanced Clean Fleet Proposed Regulation 2022.docx

Date and Time Comment Was Submitted: 2022-10-07 12:08:59

No Duplicates.

## **Comment 40 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Lawrence

Last Name: Garwin

Email Address: lawrencegarwin@yahoo.com

Affiliation:

Subject: Proposed Advanced Clean Fleets Regulation (acf2022)

Comment:

I applaud

CARB's efforts to reign in the emissions of California's trucks. I believe we need to do this as quickly as possible and therefore support the Environmental Defense Fund and other organizations in proposing three changes to the CARB staff proposal that would accelerate the transition to ZEVs and increase public health benefits of the regulation.

First, the

100% ZEV sales requirement should be moved up to 2036 instead of 2040. A new

report shows this change would generate \$2.7 billion in additional health care savings by 2050, cut an additional 24 million metric tons of climate pollution, and put 133,000 ZEV trucks on the road in 2050 (comprising 78% of all trucks). In 2035, the average ZEV truck will cost almost \$50,000 less to operate over its lifetime than a combustion engine truck.

Second,

the 50 or greater fleet size floor for the in private fleet requirements to apply should be decreased to 10 vehicles for Class 7 and 8 trucks (these are the large tractors that pull separate trailers). These tractors account for only 12% of MHD trucks but emit half of the NOx from all MHD trucks. This change would decrease NOx and PM2.5 emissions by an additional 16% compared to the CARB staff proposal.

Third, in

the fleet ZEV composition schedule for private fleets (See Table above) the Class 8 sleeper cabs should be moved up three years to be consistent with the day cabs (row 2 of the table).

CARB has

analyzed the combined effect of our three recommended changes and presents the results as Alternative 2 in its staff report, which is available for public comment. The analysis indicates Alternative 2 results in 59% greater health benefits, 55 to 60% additional NOx, PM2.5 and GHG emission reductions, and even a small increase in the net savings to fleet operators. Adopting Alternative 2 of the ACF rule rather than the staff proposal presents a critical opportunity to more rapidly clean up the air in California and takes a stronger step towards meeting the Governor's climate goals, while decreasing the cost of operation for fleet owners. Our leaders must finalize a stronger rule.

Thank you

for seriously considering making these changes to support us and our children in having a healthier and more livable home.

Lawrence

Garwin  
Palo Alto,  
California

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-07 12:44:57

No Duplicates.

## **Comment 41 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jack

Last Name: Guzman

Email Address: jlfoodmart@sbcglobal.net

Affiliation:

Subject: RE: Title 13. Public Hearing to Consider Proposed Advanced Clean Fleets Regulation  
Comment:

Please see attached message

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-acf2022-WmgFM1NgVDVXYAk5.pdf'

Original File Name: 20221007131245435.pdf

Date and Time Comment Was Submitted: 2022-10-07 13:00:46

No Duplicates.

## **Comment 42 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Tom

Last Name: Bair

Email Address: tom@goldenstatefreight.com

Affiliation:

Subject: ACF Regulation

Comment:

Please see attached file

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-acf2022-VDVTNlQzBwsDd1Uw.pdf'

Original File Name: ACF Regulation.pdf

Date and Time Comment Was Submitted: 2022-10-07 13:12:06

No Duplicates.

## **Comment 43 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Adam

Last Name: Lane

Email Address: [alane@labusinesscouncil.org](mailto:alane@labusinesscouncil.org)

Affiliation:

Subject: Advanced Clean Fleets Comments

Comment:

Please see attached file

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-acf2022-UT1VMlc0UWEFLQFx.pdf>'

Original File Name: LABC.pdf

Date and Time Comment Was Submitted: 2022-10-07 13:29:38

No Duplicates.

## **Comment 44 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Michael

Last Name: Conklin

Email Address: Prouddaddy0912@yahoo.com

Affiliation: Former owner operator/company driver

Subject: CARB REGULATIONS FOR DRAYAGE TRUCKS

Comment:

My name is Michael Conklin I used to be an owner operator here in California. I was only an owner operator for about 2 years and sold to get out of regulations and high fuel prices. Now look I'm not saying we shouldn't have a better air quality in California. But Essentially what you are doing is putting thousands of hard working employees out of business because they simply cannot afford to comply with these harsh CARB laws that are putting amongst them. Not only are you asking them to give up their livelihoods, you are asking them to put their families lives in jeopardy because all they know is trucking. Doing this is going to do nothing more than drive up costs to everything!!!! So now that affects my family and everyone else's. In a time where everything is so high as it is, this will only make things worse!!!! You guys really need to reconsider doing this !!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-07 14:12:07

No Duplicates.

## **Comment 45 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Aldo

Last Name: Oviedo

Email Address: Aldo@vipertransport.us

Affiliation: Trucking cimpany

Subject: Drayage truck regulation

Comment:

This is a bad time to do this as we just got put from pandemic truck drivers are moving out from doing trucking we all truck drivers need a break on this regulation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-08 15:49:36

No Duplicates.



## **Comment 46 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kimberly

Last Name: Sulsar

Email Address: operations@irahetabros.com

Affiliation:

Subject: CARB LAWS

Comment:

To Whom It May Concern:

The laws that are being put forth (18yrs or 800k miles on truck before it is retired) will be most damaging, not just to the trucking community in California, but the entire state. It will harm small businesses across the state and country and damaged the thousands of small trucking firms, that are mainly minority owned, as well. This must be considered and weighted heavily when making laws. These laws will force drivers and companies out of business. Supply chains will be further damaged.

Thank you,

Kim Sulsar

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-08 15:56:04

No Duplicates.

## **Comment 47 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Alfonso

Last Name: Campos

Email Address: jcpawer@gmail.com

Affiliation:

Subject: Diesel Ban

Comment:

The diesel ban that California continues to try to push is going to very negativley impact the state of California detrimentally. Truckers care about the enivornoment. However, the care we show for our environment must also be hand in hand with destroying livelihoods and industry. The trucking industry continues to get pummeled by regulation and laws to restrict it. Please remember that if you drive out truckers and small trucking firms no one will be around to deliver your food, diapers, medical supplies, building supplies, military goods and many other fundamental goods that keep this nation running. Trucking interfaces with EVERY industry and sector of the world. Please do not further destroy this industry and cause worsening supply chain issues by forcing drivers and small businesses to buy trucks that are hundreds of thousands of dollars out of reach that the infrastructure is simply not there for. The state does not even have the truck parking to support the charging stations. As it is Oakland is taking over 50 acres and turning into an A's baseball park. California needs to open it's eyes. You are going 100 miles and hour towards a brick wall...ignoring truckers please to stop.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-08 16:03:15

No Duplicates.

## **Comment 48 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mary Alyssa

Last Name: Rancier

Email Address: rancierm@agc-ca.org

Affiliation: AGC of California

Subject: Comments on Advanced Clean Fleets Regulation: High Priority and Federal Fleet Requirement

Comment:

Please see the attached comment letter for our comments.  
Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-acf2022-UjQHAdaADJSOAVa.pdf'

Original File Name: FINAL ACF Comment Letter 10.10.22.pdf

Date and Time Comment Was Submitted: 2022-10-10 09:34:33

No Duplicates.

## **Comment 49 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Colin

Last Name: Szehner

Email Address: cszehner@shieldsharper.com

Affiliation:

Subject: A diversified approach to energy dependence

Comment:

Hello

CARB,

I would like to

respectfully oppose the adoption of the Advanced Clean Fleets rule as it attempts to transition the transportation industry too quickly without a realistic consideration of the necessary infrastructure required to overhaul the state's power grid.

I do agree that

ZEV's are usefull for light duty fleets and a great way to make a big impact on air pollutants quickly. This will be effective but I believe can be completed without such a hardline approach towards ICE vehicles. I urge you to reconsider your stance against combustion engine vehicles because of how much progress has been made in their efficiency. Keeping them as a viable option for California residences will allow the state to become "diversified" in our energy dependence. Just as you would diversify your investment portfolio to withstand volatility, California should adopt a diversified energy approach in order to reduce dependence on any one type of energy.

Thanks, Colin Szehner

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-10 11:35:03

No Duplicates.

## **Comment 50 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Amy Jo

Last Name: Sihto

Email Address: amy@eldoradoalmonds.com

Affiliation: El Dorado Almonds, LLC.

Subject: ACF CARB RESTRICTIONS

Comment:

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite that, CARB plans on preventing any additional trucks enter port service after 1/1/24 unless they are Zero Emission. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months. This will have a huge negative impact on exporting agricultural goods like almonds that come from the bread basket of the central valley. Please reconsider. Please push the deadlines until the technology is available.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-10 12:03:50

No Duplicates.

## **Comment 51 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Tej  
Last Name: Pahwa  
Email Address: fortyninershell@hotmail.com  
Affiliation:

Subject: oppose Advance Clean Fleets Regulations  
Comment:

Please see the attached file

tej pahwa

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-acf2022-USJUMVY2Um8EMIVl.pdf'

Original File Name: scan0014.pdf

Date and Time Comment Was Submitted: 2022-10-10 12:19:11

No Duplicates.

## **Comment 52 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Stephanie  
Last Name: Ferguson  
Email Address: stephanie.ferguson@unitedpacific.com  
Affiliation:

Subject: Title 13. Public Hearing to Consider Proposed Advanced Clean Fleets Regulation  
Comment:

Clerk of the Board  
California Air Resources  
Board  
1001 I Street, Sacramento,  
California 95814

RE: Title 13. Public  
Hearing to Consider Proposed Advanced Clean Fleets  
Regulation

Dear Clerk of the  
Board,  
United Pacific

respectfully opposes the adoption of the Advanced Clean  
Fleets rule as it attempts to transition the transportation and  
goods movement economy much too quickly without sufficient regard  
for the necessary infrastructure overhaul in the state, a realistic  
consideration of the state's power grid capabilities, and the  
lack of an adequate and accurate cost analysis.

The regulation's proposed  
timeline will place significant strain on the transportation  
industry and gravely hamper goods movement in the state.  
Additionally, the cost of replacing fleets with entirely zero  
emissions vehicles will unduly harm small businesses in the state,  
many of which are family- and minority-owned. With the limited  
supply and options for heavy duty ZEVs, large companies with  
greater capital will be prioritized by manufacturers as compared to  
their small business counterparts. The highly restrictive timeline  
that has been proposed will only serve to further exacerbate this  
problem in the market.

Additionally, significantly  
increasing the operating costs of the transportation and goods  
movement sector within the state will ultimately harm our most  
vulnerable communities and residents the most. Low-income  
households in the state are already bearing the brunt of increased  
electricity costs,[1] which  
will only be further intensified by the adoption of this regulation  
as our unreliable grid continues to be strained beyond capacity. As  
a small business who takes great pride in serving our community,  
the impacts of the proposed regulation on the costs of goods and  
necessities, such as food, water, and fuel, are of grave  
concern.

United Pacific  
also has significant concerns because the regulation does  
not sufficiently consider the current and future needs of the  
transportation industry within the state. The range of the vehicles  
that are currently offered on the market will not ensure a seamless

transition, as many heavy-duty vehicles are often used nearly continuously to ensure the timely delivery of goods to other businesses and consumers. Moreover, the infrastructure necessary to support a full transition to zero emission fleets is not prevalent enough to serve the vast number of vehicles CARB intends to replace. This regulation will be a major disruptor to the state's supply chains, which will increase the cost of goods at every level.

We urge the Board to consider the deeply unsettling ramifications of bottlenecks in our fuel, food, water, and medical supplies, in addition to every industry that moves goods on heavy duty vehicles within the state.

For these reasons, we must respectfully oppose the adoption of the Advanced Clean Fleets rule.

Sincerely,  
United Pacific

[1] <https://www.next10.org/publications/electricity-rates-2>

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-10 12:27:53

No Duplicates.



## **Comment 53 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Rajiv

Last Name: Jain

Email Address: [rjain@btw1.com](mailto:rjain@btw1.com)

Affiliation: Bridgeport transportation & Warehousing

Subject: Advance Clean Fleets Regulation

Comment:

the new rule of 800,000 miles and life of truck  
18 years are both unrealistic  
normally drivers drive 500 miles a day, 2500  
miles a week, 10,000 miles a month  
and about 100,000 a years so in 8 years they  
drive 800,000 miles  
the new rules are not realistic.  
I called freightliner of Oakland to buy new  
truck so they can last 8 years based on my calculation  
they said the earliest they can deliver the  
trucks is june 2024-book now for \$500 down, cost \$224000 and there  
are no grants for it .  
and they can deliver on max 100 trucks on  
advance booking  
other used truck inventory is very  
low  
cost with less than 400,000 miles are cost  
120,000a nd they are not many of those to buy  
second part of the rule is even more  
unrealistic  
register these trucks before 12/31/2023 in the  
drayage registry  
and 1/1/2024 only zero emission trucks can  
registred  
there are very few zero emission trucks which  
can last for more than 200 miles on a single charge  
Tesla is now getting ready to deliver some  
trucks -which cost upward of \$400,000, grants is only \$120,000  
again tesla says it will begin producing these  
trucks soon  
we truckers have less than 14 months to buy or  
replace trucks  
both these rules are not realistic  
if goal is to be zero emission truck by  
2040  
then we should start the rule on 2032-8 years ,  
800,000 truck will last till 2040  
by 2035-2038, there will be enough truck  
produced  
if truckers buy used trucks of 400,000 miles it  
can be used only for 4 more years and then they need to buy zero  
emission trucks again ..nut there or cheap to buy  
if we can be real then instead of 800,000 mile  
rule make 1,000,000 miles  
plus take away registration in drayage

1/1/24-for zero mission ...  
zero emission should come in to play after  
1/1/2032..not earlier...  
if we cannot register normal diesel truck after  
1/1/24 and the goal is replace all diesel trucks by 2040...that is  
16 years away  
This makes no sense ..one cannot replace 5000  
trucks in 14 months ...  
so if the plan to kill small truckers/business  
owners then it is a good plan -  
already we are having issues not enough truck  
driver and now we will not have enough trucks to do we cannot do  
with what trucks we have  
the rule was 2010 engine will be good for a  
long time-fully compliant  
and now with 800,000 mile truck even 2010  
engine truck is not usable  
just be real !!!  
dont destroy port trucking

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-10 12:14:22

No Duplicates.

## **Comment 54 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: JUSTIN

Last Name: PARSONS

Email Address: JUSTIN@HILLCRESTCONTRACTING.COM

Affiliation:

Subject: AFC

Comment:

We ask CARB to postpone the adoption of this regulation until staff can properly distinguish what private fleets (and public, state, and federal fleets) can and cannot feasibly manage the transition being proposed.

We request CARB engage with the PUC and other relevant agencies to develop a report that exams the feasibility of whether or not the energy grid can be upgraded and how the grid will need to be upgraded to meet these new demands including the overall costs, ratepayer increases and a feasible timeline to accomplish this herculean feat, before deciding on enacting the proposed ACF.

We need to know the plans for addressing public DC charging stations along the highways and for remote locations.

A single big rig truck will need up to 15,000 pounds in batteries that will ultimately become hazardous waste. We request that CARB work with DTSC and EPA on developing a report that outlines how this massive new amount of hazardous waste will be managed, before deciding on enacting the proposed ACF.

We request that CARB engage a team of experts and stakeholders to determine the cost and availability of the vehicles needed to comply with the ACF regulations. Including the technological feasibility of manufacturing vehicles that will have the same capacity and power of those vehicles being replaced, and that can be replaced on a one-to-one basis. We look forward to that report that CARB must make available for public scrutiny before deciding on the proposed ACF regulations.

I appreciate we need to change emissions for global warming. Over the past few years, I have watched as many contractors have gone out of business due to CARB mandates. Truckers in particular were hard hit as CARB required them to buy a \$20,000 to \$40,000 filter until the new technology was developed. That was devastating to so many. Please do the above due diligence to prevent more destruction to companies, families, etc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-10 12:52:02

No Duplicates.

**Comment 55 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Paul

Last Name: Rozenberg

Email Address: prozenberg@suburbanpropane.com

Affiliation: Suburban Propane

Subject: Suburban Propane - Comments on Proposed Advanced Clean Fleets Regulations

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-acf2022-USJdLgFiAiQAdAFj.pdf'

Original File Name: Suburban Propane - Comments on Proposed Advanced Clean Fleets Regulations.pdf

Date and Time Comment Was Submitted: 2022-10-10 13:48:55

No Duplicates.

## **Comment 56 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: David

Last Name: Atwater

Email Address: dbatwater@vandepol.us

Affiliation:

Subject: Advanced Clean Fleets Regulation

Comment:

I have one important thought and comment that needs to be made in light of recent news of major disasters that befall us in California and across the country; that is, having all of our emergency response "eggs in one basket" namely electric light, medium, and heavy duty electric vehicles needed for emergency response. As a Company that has always been there through earthquakes, major snow events, huge deadly fires, and floods AND PANDEMICES, we have been participating in emergency response preparedness for decades.

I know that electrification of emergency and other response vehicles will make any disaster recovery and response much worse in life and death situations.

In most, if not all of the disasters experienced in our State, one of the first effects experienced is that the electrical grid goes down. Hence

the requirement for back-up power for hospitals, police facilities, California's Office of Emergency Services, and media outlets to name but a few, that also includes OUR solar powered offices with a standby 250KW generator that is regularly utilized often in area outages to keep our systems and equipment coordination running.

Just consider last month when the Governor was telling those with electric vehicles to not charge them due to overwhelming grid stresses. This was not even coupled with another disaster, like a fire or earthquake... or any other disaster where major response is required.

With electric vehicles you cannot "get there from here!" EVEN in that grid demand problem we experienced, our companies were involved working to keep power plants up with what they needed to generate power at record levels. We CAN deliver fuels and products needed without electricity as all our vehicles are independently powered and carry fuel that is turned into power without electricity or using standby power. We cannot use electric vehicle to fill those roles.

THE ASK:

Please exempt ALL vehicles that work to keep our State operating during crises. That would include: Fire Trucks, Ambulances, Police vehicles, utility vehicles, the many State, County, and local agencies vehicles that respond when disaster strikes.

Exempt all the vehicles that deliver food prepared and grocery and fuel as these vehicles provide fuel for evacuations, and response and food to keep people

alive right now. The list would be large but the need during these events would be immediate and demand all resources available to preserve human life and health.

I appreciate your thoughts to make commute and local errand cars less polluting but using a broad brush to shut down emergency response vehicles, food and fuel deliveries and support vehicles for example, lacks adequate consideration of the redundancy needs required for large crises.

Remember, in all large emergencies, it is ALWAYS, "All Hands on Deck."

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-10 13:15:35

No Duplicates.

**Comment 57 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Royd

Last Name: Baik

Email Address: baikr@scfuels.com

Affiliation:

Subject: Advanced Clean Fleets Regulation

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-acf2022-UjEFYgZ1BzYKUwRl.docx'

Original File Name: CARB Advanced Clean Fleet Letter.docx

Date and Time Comment Was Submitted: 2022-10-10 14:43:14

No Duplicates.



## **Comment 58 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Bob

Last Name: Shepherd

Email Address: bshepherd@quinncompany.com

Affiliation: California Caterpillar Dealers

Subject: Advanced Clean Fleets Concerns

Comment:

Please see the California Caterpillar Dealers' comments related to the overly broad scope of this regulation with respect to private fleets and for issues related to rental and service companies serving the Heavy Construction, Agricultural, Critical Services and Military Industries.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-acf2022-B2ZdOFM0BwtXfAVa.pdf'

Original File Name: ACF - Governing Board Comments on Issues for Heavy Construction Rental and Service Companies.pdf

Date and Time Comment Was Submitted: 2022-10-10 15:04:18

No Duplicates.

## **Comment 59 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: JJ  
Last Name: Rico  
Email Address: jrigo@tigerlines.com  
Affiliation: Tiger Lines, LLC

Subject: Fix the ACF  
Comment:

Please see attached file

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-acf2022-UjRTPFUsUV0DcQFp.pdf'

Original File Name: Fix the ACF.pdf

Date and Time Comment Was Submitted: 2022-10-10 15:25:25

No Duplicates.

## **Comment 60 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mark  
Last Name: Dowsing  
Email Address: mark@orionconstruction.com  
Affiliation:

Subject: Clean Fleet Regulation  
Comment:

We ask CARB to postpone the adoption of this regulation until staff can properly distinguish what private fleets (and public, state, and federal fleets) can and cannot feasibly manage the transition being proposed.

We request CARB engage with the PUC and other relevant agencies to develop a report that exams the feasibility of whether or not the energy grid can be upgraded and how the grid will need to be upgraded to meet these new demands including the overall costs, ratepayer increases and a feasible timeline to accomplish this herculean feat, before deciding on enacting the proposed ACF.

We need to know the plans for addressing public DC charging stations along the highways and for remote locations.

A single big rig truck will need up to 15,000 pounds in batteries that will ultimately become hazardous waste. We request that CARB work with DTSC and EPA on developing a report that outlines how this massive new amount of hazardous waste will be managed, before deciding on enacting the proposed ACF.

We request that CARB engage a team of experts and stakeholders to determine the cost and availability of the vehicles needed to comply with the ACF regulations. Including the technological feasibility of manufacturing vehicles that will have the same capacity and power of those vehicles being replaced, and that can be replaced on a one-to-one basis. We look forward to that report that CARB must make available for public scrutiny before deciding on the proposed ACF regulations.

We request that CARB prepare an environmental impact report required under CEQA for the estimated 500,000 new high voltage charging stations that must be in place to make this new proposed mandate feasible

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-10 17:01:45

No Duplicates.

## **Comment 61 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Samuel

Last Name: belasco

Email Address: sbelasco@bestdrayage.com

Affiliation:

Subject: Upcoming Compliance Regulations

Comment:

After reviewing the upcoming compliance for electrifying the commercial fleets in California, it has become clear that not only are these changes expected to be forthcoming, but they are inevitable. And although I agree that changes can and must occur the timeline set forth seems not only to be a second thought, but borderline Reckless. To proceed with these changes in current form without a clear path to upgrades within the infrastructure currently in place shows a true disregard for the industry and disconnection to the public. Furthermore the current timeline shows a complete disregard for the men and women who operate Within the trucking industry. So my suggestion is simple and clear.. pause for reflection, reach across the table, and be open to dialogue. This is the only way for true growth and success in this endeavor.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-10 16:55:23

No Duplicates.

## **Comment 62 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Vicki

Last Name: Ng

Email Address: vicki@forwardlogistics.net

Affiliation:

Subject: Drayage Truck Registry

Comment:

Dear Sir or Madam,

I understand that the ARBER system for drayage truck will no longer be active starting 1/1/2023.

Meanwhile the proposed legislation states that all drayage trucks added to CARB's Online System must be a ZEV beginning 1/1/2024.

Does it mean that we will still be able to add non-ZEV drayage trucks (for example, diesel) onto TRUCRS between 1/1/2023 and 12/31/2023?

Please kindly advise. Thank you.

Regards,

Vicki Ng

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-10 17:32:00

No Duplicates.

## **Comment 63 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Martin

Last Name: Keane

Email Address: mkeane57@coffmanspecialties.com

Affiliation:

Subject: "The Advanced Clean Fleets Regulation" (ACF)

Comment:

We ask CARB to postpone the adoption of this regulation until staff can properly distinguish what private fleets (and public, state, and federal fleets) can and cannot feasibly manage the transition being proposed.

We request CARB engage

with the PUC and other relevant agencies to develop a report that exams the feasibility of whether or not the energy grid can be upgraded and how the grid will need to be upgraded to meet these new demands including the overall costs, ratepayer increases and a feasible timeline to accomplish this herculean feat, before deciding on enacting the proposed ACF.

We need to know the

plans for addressing public DC charging stations along the highways and for remote locations.

A single big rig truck

will need up to 15,000 pounds in batteries that will ultimately become hazardous waste. We request that CARB work with DTSC and EPA on developing a report that outlines how this massive new amount of hazardous waste will be managed, before deciding on enacting the proposed ACF.

We request that CARB engage a team of

experts and stakeholders to determine the cost and availability of the vehicles needed to comply with the ACF regulations.

Including the technological feasibility of manufacturing vehicles that will have the same capacity and power of those vehicles being replaced, and that can be replaced on a one-to-one basis. We look forward to that report that CARB must make available for public scrutiny before deciding on the proposed ACF regulations

We request that CARB prepare an

environmental impact report required under CEQA for the estimated 500,000 new high voltage charging stations that must be in place to make this new proposed mandate feasible.

Seriously, stop. We cannot afford these unreasonable requirements and will further force us to relocate to a State that is not governed by nonsensical individuals.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 05:55:40

No Duplicates.



## **Comment 64 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: David

Last Name: VanMuyden

Email Address: DVANMUYDEN@CALPORTLAND.COM

Affiliation:

Subject: Advanced Clean Fleets Regulation - Comments

Comment:

Dear CARB Staff,

I'm concerned with the timing and applicability of the new ACF regulation which will require businesses meeting certain criteria to add only Zero-Emission Vehicles to fleets beginning Jan 1, 2024 (only 14 months away!). There are major barriers to implementation including significantly higher costs to purchase ZEVs, lack of availability, insufficient technology, uncertain grid accommodations, creating unfair competition and more. Why is CARB pushing this legislation with a 2024 date when California lawmakers have already chosen 2035 as the year to ban the sale of new gasoline powered cars. What data is CARB reviewing that suggests this will be successful more than a decade earlier?

What work is happening now to strengthen the electrical grid to sustain the additional demand? Businesses may not have the ability to charge fleet vehicles at non-peak times as was asked of Californians this past September amid a record heat wave.

Why is CARB forcing businesses of a certain size to comply with this regulation? This gives an unfair advantage to businesses under the threshold which will not need to spend millions of dollars in vehicles and fueling/charging infrastructure. Please consider postponing this regulation until a time when its implementation is practical and won't burden the businesses that support California's economy. Thank you for reviewing my comments.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 07:32:54

No Duplicates.

## **Comment 65 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: TRUNG

Last Name: NGUYEN

Email Address: kimlando1@yahoo.com

Affiliation:

Subject: CARB

Comment:

CARB

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-acf2022-BXdUNwN2VmQCbQZq.docx'

Original File Name: RETAIL - CARB Advanced Clean Fleet Proposed Regulation 2022(1).docx

Date and Time Comment Was Submitted: 2022-10-11 08:31:10

No Duplicates.

## **Comment 66 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Sarah

Last Name: Sachs

Email Address: ssachs@ceres.org

Affiliation: Ceres

Subject: Major Businesses and Institutions Support an Ambitious Clean Fleets Rule

Comment:

I'm pleased to deliver comments on behalf of 50 major businesses, institutions, employers, and investors with over \$304 billion in assets under management. These businesses and institutions strongly support an ambitious Advanced Clean Fleets (ACF) regulation that accelerates electric vehicle deployment at the pace and scale that the climate and public health crises demand.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/77-acf2022-UD0AZwNoWGRVIQdY.pdf>'

Original File Name: Major Businesses Support an Ambitious Clean Fleets Rule.pdf

Date and Time Comment Was Submitted: 2022-10-11 10:44:41

No Duplicates.

## **Comment 67 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Gary

Last Name: Rossiter

Email Address: garyr@donpedropump.com

Affiliation: Don Pedro Pump

Subject: Advanced Clean Fleets (ACF) Regulation

Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis,

they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 11:09:01

No Duplicates.

## **Comment 68 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Wil

Last Name: Bentz

Email Address: wbentz@bestdrayage.com

Affiliation:

Subject: New CARB regulations at California Ports

Comment:

Good afternoon,

I am sending this comment to try and bring a few things to light that will very much affect many people and the state if the new regulations are pushed through at the Ports.

First with the new electric trucks, that are not even in place yet, they are a lot heavier, so much more expensive to buy that im not sure how anyone is expected to afford one, and have no where near the range of travel needed to move the cargo. these things are going to increase cost to import and export companies, truck drivers, trucking companies, and consumers that are already being charged so much in the last couple years.

Also, there are no charging docks in place to support any of the lanes needed for deliveries. as well as the amout of time it takes to charge a vehicle and DOT Hours of service it will almost double the amout of transportation needed. with that amount of vehicles on the road the saftey becomes more of an issue. I just cannot see that the charging docks needed can support what will be needed by the vehicles charging, not only that with any kind of heat waves I dont see that the power needed to charge can be sustained when certain grids need to be blacked out.

With the trucks costing so much more, there isnt any good way that trucker, and companies can afford to buy them.

In the end pushing through with these new regulations will not only slow the already congested ports, but slow the transportation and deliveries all across the state. Not only the economy that already seems to be very expensive will grow out of control for many to afford any kind of living.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 11:51:44

No Duplicates.

## **Comment 69 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Angelyn  
Last Name: Tornell  
Email Address: atornell@bestdrayage.com  
Affiliation: Best Drayage, LLC

Subject: Extend the deadline for ACF Regulation!

Comment:

Please extend the current unrealistic deadline for Advanced Clean Fleets (ACF) Regulation to allow more time for the industry to react and the necessary infrastructure to be in place. The proposed ACF rule is too early for the real world situation and could further handicap an already challenged industry that the US and world relies on for the timely delivery of most things we purchase, including goods, services, and food. There are presently no Zero Emission trucks that can make the round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. It will not be physically possible for most companies to be compliant by the current deadline. Despite this fact, CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. To note: Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers/product to and from farms & facilities to the railroad and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet. Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in billions in losses in addition to thousands of lost jobs. Adding this regulation at this time without opportunity for compliance, will devastate the Ag and Drayage industries and as a result, our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 12:16:54

No Duplicates.



## **Comment 70 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Nina

Last Name: Solari

Email Address: nina@avantinut.com

Affiliation:

Subject: Stand down

Comment:

Why are policies being made that are not feasible and could likely cripple industry? At this time there are no zero emission trucks that would be able to make a round trip from the central valley to the Port of Oakland. California is always way ahead of the curve, but sometimes we need to take a break and realize the economic stresses that our state applies to business and individuals with our outrageous expectations. The push to have all cars be zero emission without the infrastructure to recharge is absurd. Now CA is wanting zero emissions for trucks to conduct hauls of export goods to and from the port? This shouldn't be a requirement until the technology and infrastructure is in place for it to be a viable option.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 12:32:23

No Duplicates.

## **Comment 71 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: suzanne

Last Name: homem

Email Address: shipping@pcsnuts.com

Affiliation:

Subject: CARB REGULATIONS

Comment:

Hello,

This regulation will wreak havoc on an already difficult trucking situation.

We already have a hard time finding trucks to haul our products.

This will make it near impossible to export our California Almonds & Walnuts using the California ports and will yet again punish our agriculture industry.

We already suffer from the Vessel delays & port congestion.

Please delay this regulation.

Respectfully,

Suzanne Homem

Office Manager

Pacific Coast Sales

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 12:37:27

No Duplicates.

## **Comment 72 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kathy  
Last Name: Hollis  
Email Address: holliscattle@yahoo.com  
Affiliation:

Subject: ACF  
Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 12:44:58

No Duplicates.



## **Comment 73 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Brenda  
Last Name: Rightnour  
Email Address: brightnour@bestdrayage.com  
Affiliation: Best Drayage, LLC

Subject: Fix the ACF (acf2022)  
Comment:

I appreciate the opportunity to provide public comment on the Proposed Advanced Clean Fleets Regulation (ACF).

This regulation in it's current form is not sustainable or practical. There are currently no charging stations for electric trucks near the ports. Not to mention, the time it will take to charge an electric truck plus having to stop for additional charges would severely hinder productivity for drivers and creat further congestion at California ports. With diesel trucks being phased out by either the year or 800,000 miles rule, many drivers will be put out of work considering the cost for them to buy an electric truck will be 3 times what they would pay for a diesel truck. This will cause further unrest and supply chain issues in CA.

We urge you to amend the ACF regulation for more flexibility so that the regulation catches up with technology and not technology catching up with the regulation.

Thank you,  
Brenda Rightnour

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 12:51:19

No Duplicates.

## **Comment 74 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jessica

Last Name: Lamke Blase

Email Address: jlamke@jpsfinc.com

Affiliation:

Subject: please delay the zero-emission deadline

Comment:

Good day,

As a concerned exporter of California grown almonds and walnuts, I kindly ask you delay the zero-emission deadline for trucks until technology is available and the state has the charging infrastructure in place to accomodate such trucks on a large scale.

At this time, there are no zero-emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Drayage trucking is so much more than just shuttling containers between terminals or local yards; it expands across the entire State of California and beyond.

Many shippers are still facing hardships as a result of the pandemic and will continue to face shipping challenges into 2023. The American consumer is directly starting to feel the pandemic related increased shipping costs in the form of inflation. Please, delay the zero-emission deadline. Shippers and the American consumer cannot absorb the cost of this policy if it were to go into effect January 1, 2024.

Thank you for your consideration.

Kind regards,  
Jessica Lamke Blase

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 12:35:20

No Duplicates.

## **Comment 75 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Steve

Last Name: Koretoff

Email Address: skorettoff@live.com

Affiliation:

Subject: Advanced Clean Fleets Regulation Comments

Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for



industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 13:58:04

No Duplicates.

## **Comment 76 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Chris

Last Name: Camp

Email Address: chris@monutco.com

Affiliation:

Subject: ACF

Comment:

Hello, I am a valley farmer who sends goods to the Port of Oakland and the Richmond Railyard. How does the California government expect valley trucking companies get to and from the Port on a single charge. There is no infrastructure or equipment in existence today or in any near future to logically believe this is feasible. You will destroy the California economy with these ridiculous laws.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 13:57:42

No Duplicates.

## **Comment 77 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Chuck

Last Name: Greenwood

Email Address: greenwood.avrfarms@gmail.com

Affiliation:

Subject: CARB

Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission.

Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the

finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 14:19:48

No Duplicates.

## **Comment 78 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Guadalupe  
Last Name: Valdovinos  
Email Address: gvaldovinos46@icloud.com  
Affiliation:

Subject: CARB Regulation  
Comment:

To whom it may correspond,  
I work for a company that ships from the central valley to the port of Oakland, the ACF is something that'll affect us big time, with short notices from the port on first receiving cargo, sometimes with as little as one day, this whole thing is really going to affect us. Forcing companies to comply when there is no equipment suited or the infrastructure for this to be feasible is only going to force small companies out of business and in that process ruined the economy of the central valley that relies on the port for export and imports. Unfortunately we are too far to be able to get one load to the port on one charge. I totally believe on clean air but in order to make changes and push something like this, the equipment and infrastructure must be ready and tested to make sure that is efficient to keep the central valley moving. I really believe that this regulation will create a lot more homelessness because without my job I'll be force to live under the bridge, and I'm not the only one on this situation. Please do not enforce this until there are resources proven to make it happen.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 13:55:56

No Duplicates.

## **Comment 79 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Don

Last Name: Barton

Email Address: dbarton@goldriverorchards.com

Affiliation:

Subject: Regarding Zero Emission Trucks

Comment:

Greetings,

I am a grower operator of a walnut processing plant located in Escalon in San Joaquin County. Our company ships several hundred containers of walnuts to our customers in the U.S. and overseas each year. CARB's proposed requirement that all trucks must operate on zero emissions, meaning EV, is simply unrealistic and will cripple our industry if upheld as currently contemplated.

For example, we're located about 80 miles east of the Oakland port. There are no EV trucks that have the power to haul a 45,000 lb load of walnuts to the port and back again because they lack the necessary range.

I have no problem with your requirement that trucks manufactured in 2010 be taken off the road and that each subsequent year more recently-manufactured trucks are taken off until we eventually have an all EV fleet in California. That provision gives both manufacturers and the lithium battery technology time to improve and lengthen range.

But to require the EV provisions by Jan 1, 2024 and to have no port access for non-EV trucks will cripple our industry.

Thanks,

Don Barton

President

GoldRiver Orchards, Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 14:33:34

No Duplicates.

## **Comment 80 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Fred

Last Name: Montgomery

Email Address: almontorchards@yahoo.com

Affiliation: Almont Orchards, Inc.

Subject: ACF Regulation

Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 14:45:54

No Duplicates.



## **Comment 81 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Patrick

Last Name: Mason

Email Address: pmasonsa@gmail.com

Affiliation:

Subject: Export Shipping

Comment:

To whom it may concern, for the last few years the export industry in California has come under siege from many foes. Labor shortages, increased material costs, rise in prices of oil which increases our ability to move goods, drought, and lack of access to supplies and equipment due to international shipping issues. Many businesses are hanging by a thread and trying everything they can to keep the California citizens employed. Many have had to close their doors and move to a new state to find new opportunities. For those still hanging on, surely, we cannot ask them to place this one more straw on the camel's back. Although the goal of this motion has merit, the timing is inappropriate. The technology is not readily available enough to move goods from throughout our state to the ports. This must be done in such a way that supports the growth of California commerce and instigates growth amongst its constituents. We appreciate your urgent consideration of this matter.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 14:50:14

No Duplicates.

## **Comment 82 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Leela

Last Name: Rao

Email Address: leela.rao@polb.com

Affiliation: Port of Long Beach

Subject: San Pedro Bay Ports comment letter

Comment:

Please see the attached San Pedro Bay Ports comment letter on the Advanced Clean Fleets regulatory proposal.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/93-acf2022-BmAFagdoVWdXPQIW.pdf'

Original File Name: FINAL\_Joint Ltr\_ACF\_10-11-22.pdf

Date and Time Comment Was Submitted: 2022-10-11 15:06:31

No Duplicates.

## **Comment 83 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Blanca

Last Name: Rubio

Email Address: taylor.valmores@asm.ca.gov

Affiliation: CA State Assembly

Subject: From Assemblywoman Blanca E. Rubio

Comment:

Dear CARB,

We've had

a number of constituents contact me about the proposed regulation the Air Resources Board staff is planning on bringing before the Governing Board in October that will require the replacement of all diesel, gasoline and natural gas vehicles > 8,500 pound GVWR with electric vehicles for all state and federal fleets, all public fleets, and for high priority private fleets with 50 vehicles or more or annual revenues of \$50 million or more in annual revenues. We understand the phase out will start with mandates as early as 2025.

Of concern is

the selection of high priority fleets simply on the basis of the number of vehicles or the amount in annual revenues without any distinction on the types of businesses that can feasibly accomplish this endeavor, let alone economically manage the requirement, especially in a time of economic downturn and high inflation. Constituents from the construction, agriculture, and emergency power systems industries have also contacted my office stating companies that meet the high priority criteria will be forced to replace with electric vehicles leaving those companies at a competitive disadvantage to those fleets that are not private high priority fleets and which are not mandated to replace their vehicles.

Also at issue are the heavy duty rental vehicles serving these industries like water trucks and dump trucks. These vehicles have no ability to be charged in remote locations such as highway and construction projects. Additionally, heavy construction and agricultural equipment service vehicles operated by such fleets also have no ability to charge their vehicles remotely. These vehicles will require high voltage DC chargers that are unavailable at remote sites and along the highways in convenient locations.

Also of concern are the costs this will impose on private companies for the charging systems required for these heavy duty vehicles, and the infrastructure to support such systems. Large companies in these businesses with hundreds of vehicles will not have the financial resources to replace so many vehicles while at the same time manage their day to day business. We are also perplexed with the aggressive phase-out this regulation represents when the proper utility infrastructure and DC charger access for heavy duty vehicles in the state is barely existent.

Before the Governing Board approves this regulation that places inequities and financial burden on large private fleets and other fleets in the state, we ask the following of your

Board:

1.

Letters have been provided to your staff identifying business types such as heavy construction equipment rentals, and heavy construction equipment and critical services maintenance and repair that cannot feasibly replace with electric due to the specialty vehicle type and variability of the day to day vehicle operations. We understand these issues have not been adequately addressed. We ask the Governing Board to postpone the adoption of this regulation until staff can properly distinguish what private fleets (and public, state and federal fleets) can and cannot feasibly manage the transition being proposed.

2.

We need

real answers to how the tremendous increase in state electrical power will be met to accommodate this proposal. Currently, California is already importing nearly 30 percent of its power needs. This regulation will only increase that demand for daily charging. The utility infrastructure for the needed increases needs to be in place to feasibly manage what is being required of these fleets. We know the Board has been wrestling with the infrastructure issue for automobiles and light duty vehicles and we are greatly concerned when you add the vehicles from these major industries to the list.

3.

We need to know the plans for addressing public DC charging stations along the highways and for remote locations. Many EV stations for cars have been installed at convenient locations, but these are not compatible or practical for use with the heavy duty vehicles used in the construction, agricultural, heavy duty rental, and critical services industries. Very little is in place for the required DC charging stations for these heavy duty vehicles, and costs for the chargers and installation is over \$100,000 each, not including the costs for necessary electric utility upgrades. Without the necessary DC charging stations for these vehicles, these industries will be unable to manage necessary construction activities and repair services, and many vehicles and drivers will be unsafely stranded.

4.

As all batteries have a limited life, we need to know if plans are identified for the coordination with DTSC and EPA to manage the hazardous waste disposal. A single Class 8 day cab can have up to 15,000 pounds in batteries that will ultimately become hazardous waste.

I look forward to the answers to these questions before the Governing Board moves forward with this regulation.

Assemblywoman Blanca E. Rubio

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 15:06:04

No Duplicates.

## **Comment 84 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Hiko

Last Name: Shimamoto

Email Address: hiko@mutualexpress.com

Affiliation:

Subject: Proposed ACF 2022

Comment:

The requirement to purchase zero emission trucks starting in 2024 is not realistic. It will bankrupt many companies and force the elimination of thousands of jobs. It is not technologically feasible. Lofty goals....but a pie in the sky.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 15:18:49

No Duplicates.

## **Comment 85 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Assemblymember Blanc

Last Name: Rubio

Email Address: taylor.valmores@asm.ca.gov

Affiliation: CA State Assembly

Subject: From a Coalition of CA Assemblymembers

Comment:

We have had a number of constituents contact us about the proposed regulation the Air Resources Board staff is planning on bringing before the Governing Board in October that will require the replacement of all diesel, gasoline and natural gas vehicles > 8,500 pound Gross Vehicle Weight Rating with electric vehicles for all state and federal fleets, all public fleets, and for high priority private fleets with 50 vehicles or more or annual revenues of \$50 million or more in annual revenues. We understand the phase out will start with mandates as early as 2025.

The selection of high priority fleets simply on the basis of the number of vehicles or the amount in annual revenues without any distinction on the types of businesses that can feasibly accomplish this endeavor, let alone economically manage the requirement, is concerning. Constituents from the construction, agriculture, and emergency power systems industries have also contacted our offices stating companies that meet the high priority criteria will be forced to replace with electric vehicles leaving those companies at a competitive disadvantage to those fleets that are not private high priority fleets and which are not mandated to replace their vehicles.

Additionally at issue are the heavy duty rental vehicles serving these industries like water trucks and dump trucks. These vehicles have no ability to be charged in remote locations such as highway and construction projects. Additionally, heavy construction and agricultural equipment service vehicles operated by such fleets also have no ability to charge their vehicles remotely. These vehicles will require high voltage DC chargers that are unavailable at remote sites and along the highways in convenient locations.

Also of concern are the costs this will impose on private companies for the charging systems required for these heavy duty vehicles, and the infrastructure to support such systems. Large companies in these businesses with hundreds of vehicles will not have the financial resources to replace so many vehicles while at the same time manage their day to day business. We are also perplexed with the aggressive phase-out this regulation represents when the proper utility infrastructure and DC charger access for heavy duty vehicles in the state is barely existent.

Before the Governing Board approves this regulation that places inequities and financial burden on large private fleets and other fleets in the state, we ask the following of your Board:

1. Letters have been provided to your staff identifying business types such as heavy construction equipment rentals, and heavy construction equipment and critical services maintenance and repair that cannot feasibly replace with electric due to the specialty vehicle type and variability of the day to day vehicle operations.

We understand these issues have not been adequately addressed. We ask the Governing Board to postpone the adoption of this regulation until staff can properly distinguish what private fleets (and public, state and federal fleets) can and cannot feasibly manage the transition being proposed.

2. We need real answers to how the tremendous increase in state electrical power will be met to accommodate this proposal. Currently, California is already importing nearly 30 percent of its power needs. This regulation will only increase that demand for daily charging. The utility infrastructure for the needed increases needs to be in place to feasibly manage what is being required of these fleets. We know the Board has been wrestling with the infrastructure issue for automobiles and light duty vehicles and we are greatly concerned when you add the vehicles from these major industries to the list.

3. We need to know the plans for addressing public DC charging stations along the highways and for remote locations. Many EV stations for cars have been installed at convenient locations, but these are not compatible or practical for use with the heavy duty vehicles used in the construction, agricultural, heavy duty rental, and critical services industries. Very little is in place for the required DC charging stations for these heavy duty vehicles, and costs for the chargers and installation is over \$100,000 each, not including the costs for necessary electric utility upgrades. Without the necessary DC charging stations for these vehicles, these industries will be unable to manage necessary construction activities and repair services, and many vehicles and drivers will be unsafely stranded.

4. As all batteries have a limited life, we need to know if plans are identified for the coordination with DTSC and EPA to manage the hazardous waste disposal. A single Class 8 day cab can have up to 15,000 pounds in batteries that will ultimately become hazardous waste.

We look forward to the answers to these questions before the Governing Board moves forward with this regulation.

From: Assemblymembers: Rubio, Cooper, Quirk-Silva, Salas, Aguiar-Curry, Gipson, Rodriguez, Grayson, Alvarez, Villapudua,

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/96-acf2022-UDNcO1YIAzILUIU5.pdf>'

Original File Name: CARB Letter 8.24.22.pdf

Date and Time Comment Was Submitted: 2022-10-11 18:52:59

No Duplicates.

## **Comment 86 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Paul

Last Name: Ewing

Email Address: paulewing@rpacalmonds.com

Affiliation: RPAC, LLC

Subject: CARB Regulations / Exporting

Comment:

We produce and export tree nuts from California. On average over 5 containers per day. We face extreme challenges in being able to export with all the issues with the ship lines and global trade, as well as the port and truckers. It is already extremely difficult to export and this additional layer of regulations will further complicate things.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 20:34:50

No Duplicates.



## **Comment 87 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Francisco

Last Name: Madrigal

Email Address: frankjmadrigal8@gmail.com

Affiliation:

Subject: Truck driving

Comment:

I do not agree with the new law that are hung set for truck drivers, it is not fair that trucks that are still in good conditions are being forced out of use.please let us keep working.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 21:23:05

No Duplicates.

## **Comment 88 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kelly  
Last Name: Camp  
Email Address: kllyc49@yahoo.com  
Affiliation:

Subject: Diesel  
Comment:

Ridiculous to consider zero emissions by 2024 for diesels.  
Farming will become non existent!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-11 22:09:44

No Duplicates.

## **Comment 89 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Damon  
Last Name: Conklin  
Email Address: dconklin@calcities.org  
Affiliation: League of California Cities

Subject: Proposed Advanced Clean Fleet Regulations  
Comment:

Greetings, On behalf of the League of California Cities, I am submitting our written comments to the proposed Advanced Clean Fleets regulations. Thank you in advance for your consideration.  
Respectfully,  
Damon Conklin  
Legislative Affairs, Lobbyist  
Transportation, Communications and Public Works  
League of California Cities

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/100-acf2022-WjISNV0wBQkLbgdu.pdf'

Original File Name: Cal Cities ACF Written Comments to CARB.pdf

Date and Time Comment Was Submitted: 2022-10-11 23:25:44

No Duplicates.

## **Comment 90 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Marty

Last Name: Giovanetti

Email Address: mgiovanetti@assuredaggregates.com

Affiliation: Assured Aggregates Co., Inc.

Subject: AFC 2022

Comment:

The proposed AFC 2022 regulations are unachievable at the time frames suggested in the proposals. This proposal is unrealistic and economically damaging to companies attempting to operate in California. Equipment and the supporting infrastructure needed, is not where it needs to be to support deliveries of product on a broad basis. When the only "real" options are electric or Hydrogen and maybe CNG, costs for deliveries of all products will be increased greatly. With all the issues facing industries in California and across the nation, this needs to be reconsidered, until the equipment, infrastructure, and industry can afford to move forward with these types of changes.

Marty Giovanetti

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 09:48:20

No Duplicates.

## **Comment 91 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: charles

Last Name: McCan

Email Address: charliem@jaco.com

Affiliation:

Subject: Oct 17, 2022 Public hearing

Comment:

the CARB board is considering making long range descions without benefit of complete understanding of transporation requirments. the focus on electric will add the need for thosusand additional trucks to transport the same tonnage as we have today. Additionally, Renewable Diesel and additional technology will provide equal benefits without the damage to Califonia residents when there are rolling blackouts when there is insufficient electric supplies and the fact that the current infrasture will take billions to improve. Just like the decsion to close last nucelar power plan 2 years ago and now the governor is not only changing his position but giving PG & E 1.4 billiun dollars to stay open due to lack of power. VERY POOR DECISION MAKING!  
Charles Mccan  
Pres WFI Transportation

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 10:09:48

No Duplicates.

## **Comment 92 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Anonymous

Last Name: Anonymous

Email Address: heavylizard@yahoo.com

Affiliation: CA State Fleet

Subject: ACF Support and Concerns

Comment:

My agency is one of the "Big 8" State Government Fleets in California. My agency fully supports the transition to ZEV fleets, but we must proceed in a way that will not overburden taxpayers with higher taxes.

First we ask CARB to consider the short and long term plans (or lack of plans) for ample power generation. If there are plans in place to create more green energy plants (solar, wind, geothermal, hydroelectric, tidal or nuclear) we recommend taking a pause to seek electrical engineering experts to determine if the power needs this regulation will generate will be met as these plants come online. If there are no plans for more power generation, CARB should pause the regulation until a sustainable power generation plan is adopted.

Second, we ask CARB to consider the extreme cost for the installation of EVSE infrastructure. My agency estimates these costs at about \$40 Million. We operate in the most remote locations of the state where planned private, state and federal EVSE projects are not currently prioritized. While we may be successful in obtaining some funding through a Budget Change Proposal to install ample EVSE at our sites, it is unlikely we will be able to have all needed EVSE in place before the regulation as written hits.

Third, we ask CARB to consider the price point of these medium and heavy duty assets. While former Governor Brown indicated in his Executive Order B-16-2012 for light duty: "The costs of zero-emission vehicles will be competitive with conventional combustion vehicles; and". This has not been the case in 2012 and is definitely still not the case in 2022. EV trucks are expected to be twice as much or more likely triple the price of ICE trucks. My agency can barely afford to replace its ICE fleet at current market rate, let alone 2 or 3 times more for EV versions with less range and utility. We ask CARB to include exemptions when the cost of a ZEV is 10% or more than the ICE equivalent.

Fourth, we ask CARB to consider the slow emergence of the market availability of certain classes of vehicles subject to the regulations. Currently there are no or few offerings on the market for 3/4 ton pickups on up to larger 33,000+ GVWR trucks. Year-by-year exemptions need to be added to the regulation if the truck you are buying either a) is not available on the market or b) is not available in the needed configuration (including range) to meet the business needs.

In closing, again we support the transition to ZEV, but the full adoption needs to 1) not crash the CA energy grid; 2) allow for the supporting EVSE to be installed within reason; 3) not be an exorbitant cost to taxpayers by more than doubling fleet

replacement costs; 4) allow for certain year-by-year exemptions when needed assets are not on the market or not available in the needed configurations.  
Thank You

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 10:08:29

No Duplicates.

## **Comment 93 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Amy

Last Name: Kay

Email Address: amyk@kayconstructionco.com

Affiliation:

Subject: ACF2022 request to delay

Comment:

We urge  
you to delay the decision on this far-reaching legislative proposal  
which will potentially do irreparable damage to our California  
economy, the trucking industry, construction industry, agriculture,  
and the truck rental business.

The  
issues outlined in the attached letter need to be addressed by CARB  
before any decisions can be made on the proposed ACF  
regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/104-acf2022-  
UTJSNQNWBTREVDA3.pdf'

Original File Name: CARB 10.12.2022.pdf

Date and Time Comment Was Submitted: 2022-10-12 11:08:23

No Duplicates.



## **Comment 94 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jon

Last Name: Kay

Email Address: jonk@kayconstructionco.com

Affiliation:

Subject: Delay ACF2022 request

Comment:

We urge  
you to delay the decision on this far-reaching legislative proposal  
which will potentially do irreparable damage to our California  
economy, the trucking industry, construction industry, agriculture,  
and the truck rental business.

The  
issues outlined in the attached letter need to be addressed by CARB  
before any decisions can be made on the proposed ACF  
regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/105-acf2022-  
AGNUMwNwUmNSCwg5.pdf'

Original File Name: CARB 10.12.2022.pdf

Date and Time Comment Was Submitted: 2022-10-12 11:12:19

No Duplicates.

**Comment 95 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ray

Last Name: Pingle

Email Address: Ray\_Pingle@msn.com

Affiliation: Sierra Club California

Subject: Charging Infrastructure Fact Sheet for ACF

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/106-acf2022-VjcCZwFmVlpQP1M9.pdf'

Original File Name: ACF Infrastructure Fact Sheet 10\_10.pdf

Date and Time Comment Was Submitted: 2022-10-12 11:26:38

No Duplicates.

## **Comment 96 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: John

Last Name: Doe

Email Address: mtboll1998@gmail.com

Affiliation: CA State Fleet

Subject: ACF Support and Concerns

Comment:

My agency is one of the "Big 8" State Government Fleets in California. My agency fully supports the transition to ZEV fleets, but we must proceed in a way that will not overburden taxpayers.

First we ask CARB to consider the short and long term plans (or lack of plans) for ample power generation. If there are plans in place to create more green energy plants (solar, wind, geothermal, hydroelectric, tidal or nuclear) we recommend taking a pause to seek electrical engineering experts to determine if the power needs this regulation will generate will be met as these plants come online. If there are no plans for more power generation, CARB should pause the regulation until a sustainable power generation plan is adopted.

Second, we ask CARB to consider the extreme cost for the installation of EVSE infrastructure. My agency estimates these costs at about \$40 Million. We operate in the most remote locations of the state where planned private, state and federal EVSE projects are not currently prioritized. While we may be successful in obtaining some funding through a Budget Change Proposal to install ample EVSE at our sites, it is unlikely we will be able to have all needed EVSE in place before the regulation as written hits.

Third, we ask CARB to consider the price point of these medium

and heavy duty assets. While former Governor Brown indicated in his Executive Order B-16-2012 for light duty: "The costs of zero-emission vehicles will be competitive with conventional combustion vehicles; and". This has not been the case in 2012 and is definitely still not the case in 2022. EV trucks are expected to be twice as much or more likely triple the price of ICE trucks. My agency can barely afford to replace its ICE fleet at current market rate, let alone 2 or 3 times more for EV versions with less range and utility. We ask CARB to include exemptions when the cost of a ZEV is 10% or more than the ICE equivalent.

Fourth, we ask CARB to consider the slow emergence of the market availability of certain classes of vehicles subject to the regulations. Currently there are no or few offering on the market for 3/4 ton pickups on up to larger 33,000+ GVWR trucks. Year-by-year exemptions need to be added to the regulation if the truck you are buying either a) is not available on the market or b) is not available in the needed configuration (including range) to meet the business needs.

In closing, again we support the transition to ZEV, but the full adoption needs to 1) not crash the CA energy grid; 2) allow for the supporting EVSE to be installed within reason; 3) not be an exorbitant cost to taxpayers by more than doubling fleet replacement costs; 4) allow for certain year-by-year exemptions when needed assets are not on the market or not available in the needed configurations.

Thank You

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 11:29:11

No Duplicates.

**Comment 97 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ray  
Last Name: Pingle  
Email Address: Ray\_Pingle@msn.com  
Affiliation: Sierra Club California

Subject: TCO Comparison Between a Used Diesel & New BEV Day Cab 10-1-22  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/108-acf2022-BWZRPVEuAjsxKaMOD.pdf'

Original File Name: TCO Comparison Between a Used Diesel and New Battery Electric Day Cab - 10-1-22.pdf

Date and Time Comment Was Submitted: 2022-10-12 11:29:33

No Duplicates.

## **Comment 98 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Deborah  
Last Name: Ackerman  
Email Address: dackerman@bestdrayage.com  
Affiliation: Best Drayage, LLC

Subject: Advanced Clean Fleets Regulation  
Comment:

The ACF Regulation will be detrimental to most trucking companies in California. Besides the cost of an electric truck, there are not enough charging stations currently in this state, let alone at the ports or yards. Many of our customer's locations would require multiple stops to charge which would cause delays on making appointment times. Many times, warehouses will fit the driver in their schedules if they are not in time for their appointments. This causes us to ultimately lose money because our driver is sitting and waiting to be loaded/unloaded and not moving on to the next load. In addition, this would also be a problem at the ports due to the excessive lines in the crowded terminals, we would miss port cuts and last free day appointments. With the weight of the electric trucks being significantly more than diesel trucks, the customers are forced to use more equipment for shipping. There is already a shortage of equipment at the ports and this would just cause more delays as well as a price increase for the customers. Many will not be able to afford this and it will cause a lot of economic problems in the long run. Please re-consider this regulation, as the State of California is not yet ready for this yet.  
Thank you,  
Deborah Ackerman

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 12:01:58

No Duplicates.

## **Comment 99 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Danielle

Last Name: Negueloua

Email Address: [dnegueloua@johansontrans.com](mailto:dnegueloua@johansontrans.com)

Affiliation:

Subject: Impact on valley companies

Comment:

We implore you to delay the deadlines for the zero emission trucks in regards to drayage . There is currently no Zero emission trucks that can make a round trip between CA central valley and the ports of LA/Oakland - to say this regulation and timeline is unrealistic is an understatement and will be crushing to CA agricultural community and the states ability to ship product out of the US . WE implore you to push the deadlines until the technology is available ; anything less is simply illogical and a death sentence to so many small and medium size CA businesses.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 13:15:45

No Duplicates.



## **Comment 100 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jim

Last Name: Neal

Email Address: Non-web submitted comment

Affiliation:

Subject: Healthy communities are more important than dirty trucks

Comment:

Please see the attached file

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/111-acf2022-UzVVPFMgV2kFXAhk.pdf'

Original File Name: Form Letter 1.pdf

Date and Time Comment Was Submitted: 2022-10-12 13:29:57

2354 Duplicates.

## **Comment 101 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Bryan

Last Name: Nelson

Email Address: bnelson@orionwealthinc.com

Affiliation:

Subject: CARB ACF Regulation

Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without

option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend  
the deadline for the finalized Advanced Clean Fleets (ACF)  
Regulation to allow more time for industry and staff to  
develop workable, affordable, and timely  
solutions.  
Sincerely,  
Bryan  
Nelson

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 13:40:49

No Duplicates.

## **Comment 102 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jeff

Last Name: Charter

Email Address: jcharterfarming@frontier.com

Affiliation:

Subject: Advanced Clean Fleets Regulation

Comment:

Let Our Voices be  
Heard

The Almond Alliance and Select

Harvest USA are asking you to take a moment to submit the below for comment to California Air Resources Board asking them to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. Comments must be submitted before October 17th. A public hearing will be held on October 27th.

For more information, [Click Here](#).

To View Coalition Letter, [Click Here](#).

We are requesting

that you copy and paste the following:

I am writing today

to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.

We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and

working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time,

there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they

shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 13:52:47

No Duplicates.

## **Comment 103 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Darin

Last Name: Titus

Email Address: titusfarms2006@gmail.com

Affiliation:

Subject: Advanced Clean Fleets (ACF) Regulation

Comment:

October 10, 2022

CARB Board Members California Air Resources Board 1001 I  
Street

Sacramento, CA 95814

Submitted Electronically

Subject: Proposed Advanced Clean Fleets (ACF) Regulation

Dear Chair Randolph, Vice Chair Berg, and CARB Board  
Members:

The undersigned organizations appreciate the opportunity to comment on the California Air Resources Board's (CARB) proposed Advanced Clean Fleets (ACF) regulation. Our coalition consists of organizations that represent California's manufacturing, commercial, industrial, agricultural, transportation, construction, energy, and public agency sectors. As a coalition, we acknowledge California's continuing efforts to develop leading-edge policies to address climate change and health-based air quality mandates. We also recognize that these efforts

GHG emission reductions pursuant to AB 32. Regrettably, we collectively find ourselves &ndash; despite require the

adoption of regulations for &ldquo;achieving the maximum technologically feasible and cost-effective&rdquo;

our best efforts &ndash; in a difficult position regarding the workability of the proposed ACF regulation scheduled to appear before you on October 27, 2022.

California businesses, industries, our employees and the local communities that we serve are in

need of your intervention. The proposal that will come before you in October is in need of

significant change. Throughout the entirety of the rulemaking process, California's private and public sector stakeholders have continually raised critical implementation issues that have been cast aside.

These concerns include vehicle availability (at scale) and supply chain issues that intensify

affordability concerns, the necessity to incorporate workable emergency response exemptions,

obvious infrastructure readiness questions, regulatory timing and process concerns (including

transparency for determining &lsquo;commercially available&rsquo; vehicles), and the need for flexible low-carbon fuel alternatives, amongst others. Since these

issues have been not been resolved, we  
are extremely concerned that the proposed ACF rule will be  
unworkable in the real world and  
could result in compromising the delivery of essential  
goods and services to Californians.

The COVID-19 pandemic, the supply chain crisis and  
inflation challenges are making it difficult  
for Californians. There is a great deal of financial  
uncertainty that exists for California, and it is  
harmful to further sow uncertainty and potential hardship.  
CARB needs its stakeholders to be  
successful and would make great strides by directing staff  
to work with us, in earnest, to develop  
workable, affordable, and timely solutions to this major  
regulatory effort before it is finalized next  
year.

Respectfully,

CALIFORNIA MANUFACTURERS & TECHNOLOGY ASSOCIATION  
101MFG, LLC.  
ALMOND ALLIANCE OF CALIFORNIA  
ASSOCIATED GENERAL CONTRACTORS & SAN DIEGO  
CHAPTER  
ASSOCIATION OF CALIFORNIA EGG FARMERS  
AUTOCARE ASSOCIATION  
CALIFORNIA ADVANCED BIOFUELS ALLIANCE  
CALIFORNIA AUTOMOTIVE WHOLESALERS' ASSOCIATION  
(CAWA)  
CALIFORNIA BUSINESS PROPERTIES ASSOCIATION  
CALIFORNIA BUSINESS ROUNDTABLE  
CALIFORNIA COMPOST COALITION  
CALIFORNIA FUELS & CONVENIENCE ALLIANCE  
CALIFORNIA GRAIN & FEED ASSOCIATION  
CALIFORNIA GROCERS ASSOCIATION  
CALIFORNIA METALS COALITION  
CALIFORNIA NATURAL GAS VEHICLE COALITION  
CALIFORNIA SEED ASSOCIATION  
CALIFORNIA RAILROADS  
CALIFORNIA RETAILERS ASSOCIATION  
CALIFORNIA WAREHOUSE ASSOCIATION  
CLEAN ENERGY  
COUNCIL OF BUSINESS & INDUSTRIES OF WEST CONTRA COSTA  
COUNTY  
HEXAGON AGILITY  
INDUSTRIAL ENVIRONMENTAL ASSOCIATION  
MANUFACTURERS COUNCIL OF THE CENTRAL VALLEY  
NATURAL GAS VEHICLES FOR AMERICA  
SAN JOAQUIN MANUFACTURING ALLIANCE  
TRILLIUM  
WESTERN GROWERS ASSOCIATION  
WESTERN INDEPENDENT REFINERS ASSOCIATION  
WESTERN PROPANE GAS ASSOCIATION

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 13:53:02

No Duplicates.



## **Comment 104 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mike

Last Name: McManus

Email Address: mmcmanus@agcsd.org

Affiliation: Associated General Contractors San Diego

Subject: Advanced Clean Fleets Regulation Comment Letter from AGC San Diego

Comment:

See attached comment letter from the Associated General  
Contractors San Diego

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/115-acf2022-  
AWAGY1cwVShQNQJt.pdf'

Original File Name: ACF.Comments.submit.10.10.2022.pdf

Date and Time Comment Was Submitted: 2022-10-12 13:53:25

No Duplicates.

## **Comment 105 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Agnes

Last Name: Suleiman

Email Address: agni.suleiman@gmail.com

Affiliation:

Subject: Extending deadline for the ACF

Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to

develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 13:54:11

No Duplicates.

## **Comment 106 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Helen

Last Name: Tomao

Email Address: htomao@selectharvestusa.com

Affiliation:

Subject: Proposed Advanced Clean Fleets Regulation

Comment:

Hello,

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

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At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized

Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.  
Thank you,  
Helen Tomao

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 13:56:30

No Duplicates.

## **Comment 107 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Andres

Last Name: Avelar

Email Address: aavelar@selectharvestusa.com

Affiliation:

Subject: Let Our Voices be Heard

Comment:

The Almond Alliance and Select Harvest USA are asking you to take a moment to submit the below for comment to California Air Resources Board asking them to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. Comments must be submitted before October 17th. A public hearing will be held on October 27th.

For more information, [Click Here](#).

To View Coalition Letter, [Click Here](#).

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I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and

trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 14:03:13

No Duplicates.

## **Comment 108 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jose  
Last Name: Gonzalez  
Email Address: joseg@hrctrucking.com  
Affiliation:

Subject: Drayage  
Comment:

The  
proposed requirements within the advanced clean fleet for drayage  
trucks beginning 1/1/2024 is unworkable.

There is  
not enough fueling infrastructure in place to support a mandate  
requiring all vehicles entered into the statewide Drayage Truck  
Registry to be zero emissions.

If this  
rule is adopted, it will no doubt result in thousands of small  
fleet operators being forced out of business.

Please  
consider pushing any initial entry standard for drayage trucks  
operating in California out until there is sufficient supply of  
charging or fueling infrastructure support the deployment of tens  
of thousands of zero emissions drayage vehicles.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 14:07:54

No Duplicates.



## **Comment 109 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kevin

Last Name: Harshberger

Email Address: kph@tricontrans.com

Affiliation: Tricon Transportation, Inc.

Subject: Extending the Clean Fleet Regulation

Comment:

Hello,

Please consider extending the Clean Fleet Regulation set to take effect on January 1, 2023 which bans all 2008-2010 model year truck engines. As you likely already know, this regulation affects more than 25% of the trucks currently serving the ports of Los Angeles & Long Beach.

This is necessary to allow truck owners to research all of the new truck power technology that is currently being offered. This is crucial to all trucking companies and especially the independent contractor single truck company. There are many challenges involved to the new NZ technology as identified below:

1. Electric vehicles: No infrastructure, Limited availability, limited range, high cost, reduces allowable cargo weights due to it's weight.

2. Hydrogen: New technology mostly unproven, high cost, limited availability, no infrastructure.

We all want clean air, including truckers but rushing in perceived power technology prior to proper vetting and infrastructure is ludicrous. We all learned that expensive lesson with LNG power. Where in 2008 government entities were giving out \$100,000 grants to purchase these, then in 2020 paying us another \$100,000 to scrap them.

Let's think smarter and extend the January 1, 2023 deadline by at least one full year.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 14:02:17

No Duplicates.

## **Comment 110 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: manuel

Last Name: zamora

Email Address: zamoratr@sbcglobal.net

Affiliation: MC2 Transportation / Zamora Trucking

Subject: Advanced Clean Fleets Regulation

Comment:

The proposed requirements within the advanced clean fleet for drayage trucks beginning 1/1/2024 is unworkable.

There is not enough fueling infrastructure in place to support a mandate requiring all vehicles entered into the statewide Drayage Truck Registry to be zero emissions.

If this rule is adopted, it will no doubt result in thousands of small fleet operators being forced out of business.

Please consider pushing any initial entry standard for drayage trucks operating in California out until there is sufficient supply of charging or fueling infrastructure support the deployment of tens of thousands of zero emissions drayage vehicles.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 14:15:19

No Duplicates.

## **Comment 111 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Diana

Last Name: Trejo

Email Address: diana@greentruckingllc.com

Affiliation:

Subject: Advanced Clean Fleet Rule - Drayage

Comment:

The  
proposed requirements within the advanced clean fleet for drayage  
trucks beginning 1/1/2024 is unworkable.

There is  
not enough fueling infrastructure in place to support a mandate  
requiring all vehicles entered into the statewide Drayage Truck  
Registry to be zero emissions.

If this  
rule is adopted, it will no doubt result in thousands of small  
fleet operators being forced out of business.

Please  
consider pushing any initial entry standard for drayage trucks  
operating in California out until there is sufficient supply of  
charging or fueling infrastructure support the deployment of tens  
of thousands of zero emissions drayage vehicles.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 14:18:57

No Duplicates.

## **Comment 112 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Evan

Last Name: L

Email Address: EVAN@PHOENIXPDQ.COM

Affiliation:

Subject: Advanced Clean Fleet Rule - Drayage

Comment:

The proposed requirements within the advanced clean fleet for drayage truck beginning 1/1/2024 is utterly ridiculous and unrealistic. Maybe you should start putting in the infrastructure first before you start thinking about mandates. Obviously this rule is an attempt to let the big trucking companies take over the port and create an oligopoly. You should think about all the other companies that you will be putting out of business and come up with a more realistic plan that is fair to EVERYONE.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 14:14:20

No Duplicates.

## **Comment 113 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Alfredo

Last Name: Barajas

Email Address: ajbarajasjr@pacanchor.com

Affiliation:

Subject: We are in support of new Clean Fleet Regulation

Comment:

With a fleet of over 120 vehicles, we are in support and in compliance with these new regulations. We firmly believe that these short term investments will lead to long term benefits for our future generations. And we understand that these changes can be costly and scary to face as change always is, but with a large portion of our trucks being near zero emissions we are seeing the success of these trucks in daily operations for our transportation equipment needs. They are able to handle containers (loads and empties) with zero issues and even have great mileage/range on these tanks. And for our future generations, we will inherit them a cleaner, healthier future that they deserve. The future is one step ahead and we are here to make the stride. Lets come together as an industry and make this happen.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 14:06:08

No Duplicates.

## **Comment 114 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Susan  
Last Name: Griffiths  
Email Address: susan.griffiths@hyliion.com  
Affiliation: Hyliion

Subject: ACF Comment #2 HYLIION, INC.  
Comment:

Please see attached  
PDF. Thank you for your consideration.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/125-acf2022-UTkFegFsAjhWOVc4.pdf'

Original File Name: Hyliion Oct 2022 CARB ACF Comments.pdf

Date and Time Comment Was Submitted: 2022-10-12 15:03:40

No Duplicates.

## **Comment 115 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Toby

Last Name: Slayman

Email Address: tslayman@globeconfreight.com

Affiliation:

Subject: Advanced Clean Fleet Rule - Drayage

Comment:

Subject:

Advanced Clean Fleet Rule - Drayage

Message:

The proposed requirements within the advanced clean fleet for drayage trucks beginning 1/1/2024 is unworkable.

There is not enough fueling infrastructure in place to support a mandate requiring all vehicles entered into the statewide Drayage Truck Registry to be zero emissions.

If this rule is adopted, it will no doubt result in thousands of small fleet operators being forced out of business. Please consider pushing any initial entry standard for drayage trucks operating in California out until there is sufficient supply of charging or fueling infrastructure support the deployment of tens of thousands of zero emissions drayage vehicles.

While we support the goal of zero emission for drayage trucks and look forward to it in the future, the infrastructure is not available and will not be by the time of implementation of this rule.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 15:07:45

No Duplicates.



## **Comment 116 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Monica

Last Name: Rivera

Email Address: beattiestruckinggroup@gmail.com

Affiliation: Beattie's Trucking Group, Inc.

Subject: Advanced Clean Fleet Rule - Drayage - California Ports

Comment:

Dear Sir or Madam

The proposed requirements within the advanced clean fleet for drayage trucks beginning 1/1/2024 is impossible to meet. I understand the concerns regarding the environment. However your office and the drayage community needs to come together and build the infrastructure we all need so that this mandate can be successful.

Unfortunately, the infrastructure for this mandate is not there yet. For starters our state power grid can not support this mandate or our current annual heat waves. There are not enough recharging stations or fueling infrastructure in place to support a mandate requiring all vehicles entered into the statewide Drayage Truck Registry to be zero emissions. Additionally, there are not enough mechanics or automotive repair shops that have been certified to work on these costly trucks statewide or nationally.

Please take into consideration that if this rule is adopted, it will no doubt result in thousands of small fleet operators being forced out of business.

Lastly, please consider pushing any initial entry standard for drayage trucks operating in California out until the infrastructure has been built to support the deployment of tens of thousands of zero emissions drayage vehicles.

Thank you in advance for taking the time to read my concerns.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 15:12:01

No Duplicates.

## **Comment 117 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Lauren

Last Name: Roberts

Email Address: Lauren.R@rebeloil.com

Affiliation:

Subject: Opposition of Proposed Advanced Clean Fleets Regulation

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/128-acf2022-B2QFbFwwU2JQOVQL.pdf'

Original File Name: COMBO WHOLESALE-RETAIL - CARB Advanced Clean Fleet Proposed Regulation 2022.docx.pdf

Date and Time Comment Was Submitted: 2022-10-12 15:27:40

No Duplicates.

## **Comment 118 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Gabriel  
Last Name: Rodriguez  
Email Address: gabriel@flyingexpressinc.com  
Affiliation: Flying Express, Inc

Subject: Advanced Clean Fleet Rule - Drayage  
Comment:

The  
proposed requirements within the advanced clean fleet for drayage  
trucks beginning 1/1/2024 is unworkable.

There is  
not enough fueling infrastructure in place to support a mandate  
requiring all vehicles entered into the statewide Drayage Truck  
Registry to be zero emissions.

If this  
rule is adopted, it will no doubt result in thousands of small  
fleet operators being forced out of business.

Please  
consider pushing any initial entry standard for drayage trucks  
operating in California out until there is sufficient supply of  
charging or fueling infrastructure support the deployment of tens  
of thousands of zero emissions drayage vehicles.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 15:32:05

No Duplicates.

## **Comment 119 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Dave

Last Name: Cortese

Email Address: Non-web submitted comment

Affiliation:

Subject: CARB's Advanced Clean Fleets Rule

Comment:

Please see attached file

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/130-acf2022-WzgFYlAjUWBRCFAx.pdf>'

Original File Name: Carb Advance Clean Fleets Rules CorteseV2.pdf

Date and Time Comment Was Submitted: 2022-10-12 15:33:12

No Duplicates.

## **Comment 120 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: John

Last Name: Marlow

Email Address: Non-web submitted comment

Affiliation:

Subject: Fix the ACF

Comment:

Please see attached file

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/131-acf2022-AmQCbVQtAAwHdVQ8.pdf'

Original File Name: Fix the ACF 2.pdf

Date and Time Comment Was Submitted: 2022-10-12 15:46:36

No Duplicates.

## **Comment 121 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: rick  
Last Name: beale  
Email Address: rbealeorland@aol.com  
Affiliation: Almond Farmer

Subject: Advanced Clean Fleets  
Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 15:50:49

No Duplicates.

## **Comment 122 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Sam

Last Name: Wilson

Email Address: [swilson@ucsusa.org](mailto:swilson@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: Memo on Tractor Truck Fleet Compliance Threshold

Comment:

Please see attachment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/133-acf2022-WjsFYARjWFQBc1U9.pdf>'

Original File Name: ACF Threshold Analysis Memo - September 2022.pdf

Date and Time Comment Was Submitted: 2022-10-12 15:54:14

No Duplicates.



## **Comment 123 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Sam

Last Name: Wilson

Email Address: [swilson@ucsusa.org](mailto:swilson@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: Cost/Benefit Analysis of 100 percent ZEV Sales Dates

Comment:

Please see attachment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/134-acf2022-BWZUM1B8BzcEbgls.pdf>'

Original File Name: ca-clean-trucks-report (1).pdf

Date and Time Comment Was Submitted: 2022-10-12 15:56:40

No Duplicates.

## **Comment 124 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Louie

Last Name: Lopez

Email Address: louie@bayareacontainer.com

Affiliation:

Subject: Proposed Advanced Clean Fleets Regulation

Comment:

Small independent trucking bussiness is the backbone of Supply Chain movment.

Why does the government put clean air regulation on our backs?? We are all want clean air and we truckers will do our part given the right time frame. Big manufacturing companies get all the breaks, it is time for small bussiness to get a break!!

We need more time, more money and above all the infrastructure NEEDS to be in place.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 15:51:41

No Duplicates.

## **Comment 125 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: RAJA

Last Name: KUMAR

Email Address: RKUMAR@BTW1.COM

Affiliation:

Subject: Opposition to Proposed Advanced Clean Fleets Regulation

Comment:

we need miles extended to 1 million

and also delay zero emissions out until there is technology  
& infrastructure to support electric vehicles  
you are taking away our livelihood away & nothing to replace  
with

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 16:21:03

No Duplicates.

## **Comment 126 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Scott

Last Name: Shimamoto

Email Address: scott@mutualexpress.com

Affiliation: Mutual Express Company, Oakland, CA

Subject: Advanced Clean Fleet Rule - Drayage

Comment:

Thank you for the opportunity to submit comments on this proposed ACF rule. I seriously hope all of these comments do not fall on deaf ears and that CARB seriously considers ALL of the opinions expressed in this forum.

In my opinion, there are many problems with this proposed regulation. First of all, I am all for cleaner tail pipe emissions and pollution reduction. However, to mandate that from 1/1/2024 all new drayage trucks registering for the first time in the CARB online system / drayage registry must be ZEVs is unrealistic and unfair. There is currently not enough public charging infrastructure and/or hydrogen fueling stations set up in the state necessary to service the amount of ZEV class 8 tractors that would be added. I have serious doubts that there will be enough charging infrastructure and hydrogen fueling stations needed by 1/1/24. In fact, I'm sure there won't be. This rule is asinine, CARB is putting the carriage before the horse. Plus the cost of ZEV trucks and the necessary charging infrastructure is way too much for most drayage companies to afford. Traditionally drayage companies purchase 3rd or 4th generation used trucks for the lowest price available because this is a very low margin business. Drayage companies aren't huge Forbes list entities. I hope CARB has considered this. We are mostly small family run businesses that are lucky enough to break even each year. Where are we supposed to come up with the millions of dollars it will take to electrify our whole fleets. Most of the incentive grants only get us half way there. So for a \$400,000 truck the grant's only cover up to \$200,000. If we have to replace 5 trucks that's 1 million dollars that we don't have. There's a saying that the port is where old trucks come to die. Most drayage companies never buy new trucks because we can't afford them. CARB is trying to force us to spend money we don't have and if we don't spend the money we can't exist as a business anymore. Doesn't something seem immoral with that picture??? That in addition to that, most drayage companies and drivers are immigrants and/or minorities. I don't think I need to expound on the racial inequities that already exist in our society and California. But this rule will perpetuate those biases. I don't know how any of you sleep at night knowing that this proposed regulation will take away THOUSANDS of people's livelihoods. It's bad enough that we already have to replace our 2009 engines with 2010 or newer before the end of this year. I'm sure you're already putting a lot of people out of business with that mandate. This is on top of what we're dealing with regarding AB5. I know that's not on CARB but put yourselves in the shoes of a drayage company or driver. No wonder owner

operators that have 2009 or older trucks are leaving the industry. CARB will be partially responsible when drayage capacity drops and the things we all need like food, medicine, and clothes are more expensive and harder to get.

It seriously baffles me that CARB is even proposing this draconian rule. There are right and wrong ways to go about everything. This is clearly the wrong way. We can all share a common goal of one day all vehicles be zero emission but how many people are you willing to hurt in pursuit of that goal? Shouldn't the answer be none??? But, clearly CARB thinks drayage companies are expendable or you wouldn't even be proposing this rule. I urge you to reconsider pushing back the start date until there is ample public charging infrastructure and hydrogen fueling stations and the cost of ZEVs comes down to reasonable amounts. I appreciate the opportunity to voice my opinion on the matter. Please do the right thing. There are thousands of people who work in drayage that this will affect. Please consider us. We are not expendable nor should we be viewed as such.

Scott Shimamoto, VP  
Mutual Express Company

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 16:24:16

No Duplicates.

## **Comment 127 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Lakhbir

Last Name: Bhambra

Email Address: aone.trucking@yahoo.com

Affiliation:

Subject: 800,000 miles rule

Comment:

Hello all, please note all trucks operating in ports now are according to the clean air emissions rule, truckers just spent their money on trucks buying replacements of 2009. Looking at the economy and slowing down business, it is hard to buy new trucks as there is shortage of trucks as manufacturers are unable to build per demand. I think trucks should be allowed 1,000,000 miles. Just make sure to the emissions quality, govt has started the smog test. It is my opinion that looking at all facts, CAR should adopted 1,000,000 mile rule rather 800,000 miles rule.  
sincerly  
Lakhbir Bhambra

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 16:48:03

No Duplicates.

## **Comment 128 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Paolo

Last Name: Beltran

Email Address: pbeltran@lakewoodcity.org

Affiliation: City of Lakewood

Subject: Comments on the Draft ACF Public Fleets Regulatory Language

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/139-acf2022-WjYHZAB1BCNWNQZ0.pdf'

Original File Name: Letter - CARB Comment Letter 10-12-22.pdf

Date and Time Comment Was Submitted: 2022-10-12 17:11:35

No Duplicates.

## **Comment 129 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Cathy

Last Name: Moorhead

Email Address: cmoorhead@cityofwillits.org

Affiliation: City of Willits

Subject: Advanced Clean Fleets Regulation (acf2022)

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/140-acf2022-UWNQMVcmUC1VJm0D.pdf'

Original File Name: ACF Public Fleets Letter - LCC.pdf

Date and Time Comment Was Submitted: 2022-10-12 17:27:52

No Duplicates.



## **Comment 130 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Herbert

Last Name: Olivares

Email Address: olivares1980us@yahoo.com

Affiliation:

Subject: 800,000 to 100,000 rule should be changed.

Comment:

Why not reconsider the 800,000 rule to be 100,000. Some of us already bought trucks with high miles due to manufacturers shortage..

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 17:58:41

No Duplicates.

## **Comment 131 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ruben

Last Name: Aronin

Email Address: ruben@betterworldgroup.com

Affiliation: ACF Advocacy Coalition

Subject: Recommendations on CARB's Advanced Clean Fleets Regulation

Comment:

The ACF Advocacy coalition consisting of more than 70 environmental justice, labor, health, scientific, environmental and businesses and trade associations urges CARB to meet Governor Newsom's call for more aggressive climate leadership by strengthening the ACF rule to support jobs and to ensure that the fullest health and air quality benefits are secured for Californians burdened by some of the worst air quality in the nation.

Our Recommendations: The Board should adopt a modified version of the Accelerated ZEV Transition Alternative (aka "Alternative 2") set forth in the Initial Statement of Reasons (ISOR).

1. Require 100% ZEV sales by 2036 (instead of 2040).

2. Take 2 actions to further reduce toxic emissions from Class 7 & 8 Tractors

a) Move Class 8 Sleeper Cabs from Group 3 to Group 2 vehicles in the High Priority Fleets Rule so that all Class 7 and 8 tractors are subject to the same transition schedule beginning 2027 (instead of 2030). This first ZEV milestone date requires a fleet to have 10% of its vehicles as ZEV.

b) Lower the High Priority Fleet threshold for Class 7 & 8 tractors from 50 to 10 trucks.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/142-acf2022-BmdSNwBnAg4KbwBv.pdf>'

Original File Name: ACF Coalition Recommendations to the Board on ACF- 10-12-2022.pdf

Date and Time Comment Was Submitted: 2022-10-12 17:57:22

No Duplicates.

## **Comment 132 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Michael

Last Name: Farmar

Email Address: mfarmer@earthlink.net

Affiliation: Grower

Subject: Advanced Clean Fleets Regulation

Comment:

Ladies & Gentlemen:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation for four years to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation for four years to allow more time for industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 18:31:25

No Duplicates.

## **Comment 133 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Bhupinder  
Last Name: Ojla  
Email Address: Bhupoj@yahoo.com  
Affiliation:

Subject: Proposed Advanced Clean Fleet Rule  
Comment:

This new Rule will be disaster for small fleet owners who just live hand to mouth. We want to Run our Trucks up to minimum 1 million Miles unless it stop working. We can't afford to buy new Technology Trucks which are very expensive @ this time and also there is shortage of new Trucks and EQUIPMENTS. If Govt. wants to bring new Rules, they should replace our Trucks @ Zero cost. We need clean air and better health and ZE VEHICLES. We need Freedom not Slavery for living. You should wear our shoes then you can feel our concerns. Therefore we request to you stop this new Rule and delay another 5 years.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-12 23:05:46

No Duplicates.

## **Comment 134 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Baron

Last Name: Bigler

Email Address: baron@bigler.com

Affiliation:

Subject: Deadline for clean air trucks

Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export

economy.

Please, extend the  
deadline for the finalized Advanced Clean Fleets (ACF)  
Regulation to allow more time for industry and staff to  
develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 06:44:58

No Duplicates.

## **Comment 135 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Brandon

Last Name: McDonnell

Email Address: Brandon@pcclogistics.com

Affiliation:

Subject: Opposed to CARB in the near term

Comment:

To whom it may concern,

California supply chain is not ready for CARB and will damage the supply chain and small business to the point of no return. The technology is not there yet and more so the infrastructure is not there yet. It took TESLA over 8years to place the infrastructure to properly charge cars and allow for trips from Bay Area to LA.

10's of thousanads of jobs will be lost. When the grid is stressed how will be move freight? Will our children not be able to go to school because the buses cannot be charged? We agree in time but it has to be done right in phases with the proper planning. Let the technology catch up to the idea. Allow the cost of this technology to come down so that these trucks, buses and heavy equipment is affordable to the everyman.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 06:55:16

No Duplicates.



## **Comment 136 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ron  
Last Name: Cancilla  
Email Address: ron@impacttransportation.com  
Affiliation:

Subject: PLEASE be realistic  
Comment:

Folks,  
Its simple  
We do not have the infstructure. Were at least a decade  
away.  
The equipment is too heavy, and needs MASSIVE improvement in  
longevity.  
Please be realistic. Were NOT ready for this nor will we be in  
this proposed time frame.  
Loosing the 2009's will be hard enough. You will feel that.  
SOON

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 06:56:42

No Duplicates.

## **Comment 137 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Aaron

Last Name: Shelton

Email Address: aj\_shelton@trane.com

Affiliation:

Subject: The Advanced Clean Fleets Regulation

Comment:

To Whom it may concern,

I am responsible for a fleet of 300 vehicles driven by HVAC technicians responsible for maintaining building systems. As you may know buildings account for 50% of the worlds energy usage, and half of that is consumed in order to heat or cool the building. We have evaluated the electric products on the market that will enable our technicians to continue to make buildings more efficient, and there simply aren't any made that will allow us to carry the tools we need to effectively maintain these buildings. The majority of our vehicles are <10,000 GVW, so I would request that this legislation be modified to only include vehicles over 10k GVW This will allow us to reduce energy consumption from buildings, and continue our mission to drive sustainability.

Further,

We request CARB engage with the PUC and other relevant agencies to develop a report that exams the feasibility of whether or not the energy grid can be upgraded and how the grid will need to be upgraded to meet these new demands including the overall costs, ratepayer increases and a feasible timeline to accomplish this herculean feat, before deciding on enacting the proposed ACF.

We need to know the plans for addressing public DC charging stations along the highways and for remote locations.

A single big rig truck will need up to 15,000 pounds in batteries that will ultimately become hazardous waste. We request that CARB work with DTSC and EPA on developing a report that outlines how this massive new amount of hazardous waste will be managed, before deciding on enacting the proposed ACF.

We request that CARB engage a team of experts and stakeholders to determine the cost and availability of the vehicles needed to comply with the ACF regulations. Including the technological feasibility of manufacturing vehicles that will have the same capacity and power of those vehicles being replaced, and that can be replaced on a one-to-one basis. We look forward to that report that CARB must make available for public scrutiny before deciding on the proposed ACF regulations.

We request that CARB prepare an environmental impact report required under CEQA for the estimated 500,000 new high voltage charging stations that must be in place to make this new proposed mandate feasible.

Thank you for your consideration,

Regards,

A.J. Shelton

Regional Service Operations Leader  
Trane  
714-474-5593

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 07:09:10

No Duplicates.

## **Comment 138 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Trinity

Last Name: Parreira

Email Address: trinity@rpacalmonds.com

Affiliation:

Subject: No California Air Resources Board - Advanced Clean Fleets Regulation

Comment:

To whom it may  
concern:

The Proposed Advanced Clean Fleets Regulation is a detrimental regulation to all commodities and goods in California. To enforce such a regulation without proper funding to each individual who owns a truck that is in business in the global supply chain industry is criminal. Such a regulation will cost producers and consumers dearly. The only select general population who isn't affected are those in government and legislation who do not know the inner workings of the trucking industry. Lowering emission in one industry does not and will not solve the world problems. We need to look at other option, as in Shanghai. Where they have found was to utilize their emissions for a cleaner future. We as a nation are so focused on electric energy that we have stopped searching for other means to make this world a cleaner place. It seems electric energy is promoted to further furnish funds into this market to up the value of one's stock. This regulation is highly fraudulent in nature. Let's really be open to other means of clean energy and do right by the trucking industry, who has endured so much over the last several years. This promoting of electric vehicles will ultimately deplete our copper resources. Due to the high value of electric market, we as a nation fail to look at the other resources we will destroy along the way. There are no Zero Emission truck available that can make it between the Central Valley and the Port of Oakland (or LA/Long Beach) on one charge, and each charge takes a minimum of 6 hours. How can the industry be expected to purchase something that does not exist? The lightest Zero-Emission truck on the road today weighs 12,000 lbs. more than an average diesel truck of the same model. That means cargo weights will be slashed by as much as 30% per load. There is little to no charging infrastructure for trucks at this time. The port congestion the industry has seen the past couple years will pale in comparison to what will happen if the industry cannot replace trucks after 1/1/2024. Please urgently halt the un-necessary regulation and for once do right by the people in this nation.

Truly,  
Trinity Parreira

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 07:39:55

No Duplicates.

## **Comment 139 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mohammad

Last Name: Khan

Email Address: riaztransinc2021@gmail.com

Affiliation:

Subject: NO TO Zero Emissions

Comment:

We simply can not go zero emissions anytime soon because there isn't any places that allow us to charge a semi.what will happen is there won't be any imports/exports being moved and that will result in the economy failure.Also the range on the Electric Semi simply doesn't allow me as a driver out of the Central Vally to drive all the way to the PORT OF OAKLAND and back I would need to stop somewhere to charge that will effect my Hours of Service.This law will simply destroy all of trucking jobs and livelihood for anyone doing port work.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 08:16:40

No Duplicates.

## **Comment 140 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Parmveer

Last Name: Singh

Email Address: parmveer\_gna@yahoo.com

Affiliation:

Subject: Clean zero emissions

Comment:

My opinion is need to stop call 12 years or older and more then  
800000 miles Diesel truck on California port idea to pollution some  
truck remove DPF filter also check them

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 07:59:09

No Duplicates.

## **Comment 141 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Lori

Last Name: Coburn

Email Address: lori@camposbrothers.com

Affiliation:

Subject: ACF Regulation Extension Request

Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable,



and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 09:06:36

No Duplicates.

## **Comment 142 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Parm

Last Name: Shahi

Email Address: Parmshahi@hotmail.com

Affiliation:

Subject: Clean fleet regulations

Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to

develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 09:25:36

No Duplicates.

## **Comment 143 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Chuck

Last Name: Helget

Email Address: chelget@republicservices.com

Affiliation: Republic Services

Subject: Comments - Proposed ACF Regulations

Comment:

Comment Letter attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/157-acf2022-UiBW11ULADBROFc6.zip'

Original File Name: RS Comments-CARB ACF-10-12-22\_000047.zip

Date and Time Comment Was Submitted: 2022-10-13 09:32:30

No Duplicates.

## **Comment 144 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Gina

Last Name: Looney

Email Address: glooney@selectharvestusa.com

Affiliation: Select Harvest

Subject: CARBS Advanced Clean Fleet

Comment:

<h1 style="margin: 0in; margin-bottom: .0001pt; line-height: 25.5pt; mso-line-height-rule: exactly; vertical-align: middle;">Let Our Voices be Heard</h1>

The Almond Alliance and Select Harvest USA are asking you to take a moment to submit the below for comment to California Air Resources Board asking them to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. Comments must be submitted before October 17th. A public hearing will be held on October 27th.

For more information, [Click Here](#).

To View Coalition Letter, [Click Here](#).

We are requesting that you copy and paste the following:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle

containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 10:10:29

No Duplicates.

## **Comment 145 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kristy  
Last Name: Delgadillo  
Email Address: kdelgadillo@okalogistics.com  
Affiliation:

Subject: Advanced Clean Fleet Rule - Drayage  
Comment:

Subject:  
Advanced Clean  
Fleet Rule - Drayage

Message:

The proposed requirements within the advanced clean fleet for drayage trucks beginning 1/1/2024 is unworkable.

There is not enough fueling infrastructure in place to support a mandate requiring all vehicles entered into the statewide Drayage Truck Registry to be zero emissions.

If this rule is adopted, it will no doubt result in thousands of small fleet operators being forced out of business.

Please consider pushing any initial entry standard for drayage trucks operating in California out until there is sufficient supply of charging or fueling infrastructure support the deployment of tens of thousands of zero emissions drayage vehicles.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 10:19:12

No Duplicates.



## **Comment 146 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Richard  
Last Name: Damilano  
Email Address: Rdamilano@gocfl.com  
Affiliation:

Subject: Advanced Clean Fleets Rule  
Comment:

Please see the attached file

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/161-acf2022-AGFRM1AnVWcAaAFi.pdf'

Original File Name: Advanced Clean Fleet Rule.pdf

Date and Time Comment Was Submitted: 2022-10-13 11:32:12

No Duplicates.

**Comment 147 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Alissa

Last Name: Recker

Email Address: [alissa.recker@daimlertruck.com](mailto:alissa.recker@daimlertruck.com)

Affiliation: Daimler Truck North America

Subject: DTNA Comments on Proposed ACF Regulation

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/162-acf2022-BmIGdARrWGpVDABj.pdf>'

Original File Name: DTNA\_Comments for ACF\_Regulatory Documents\_October 2022.pdf

Date and Time Comment Was Submitted: 2022-10-13 11:44:55

No Duplicates.

## **Comment 148 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Robert  
Last Name: Spiegel  
Email Address: rspiegel@cmta.net  
Affiliation: CMTA

Subject: Business-Industry Coalition Comments - Proposed ACF Regulation  
Comment:

Attached are comments on behalf of a coalition of businesses and industries.  
Thank you in advance for your consideration.

Rob Spiegel  
Senior Policy Director  
California Manufacturers & Technology Association  
(CMTA)

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/163-acf2022-UjAFdgByV20Hbwdi.pdf'

Original File Name: Business-Industry Coalition Letter - ACF Rulemaking.pdf

Date and Time Comment Was Submitted: 2022-10-13 11:52:13

No Duplicates.

## **Comment 149 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: steve

Last Name: slinkard

Email Address: slinkardfarms@outlook.com

Affiliation:

Subject: acf regulation

Comment:

I am writing today to ask to extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for industry and staff to develop workable, affordable, and timely solutions. We are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods, services, and food to Californians, the nation, and the world.

As a proud and working member of the California Almond community, we provide 85% of the world's supply of almonds, and 70% of the nation's almonds. Of our 7,600 almond farms, 70% are family owned and operated with 90% being less than 100 acres grown across 16 counties in California's Great Central San Joaquin Valley, adding \$9.2B annually to California's economy, and is one of the third largest agricultural exports for the US.

At this time, there are no Zero Emission trucks that can make a round-trip between California's Central Valley and the Ports of Los Angeles, Long Beach or Oakland. Despite this fact - the solutions for compliance not being available - CARB plans on preventing any additional trucks from entering port service after 1/1/24 unless they are Zero Emission. Drayage trucks do more than just shuttle containers between terminals or local yards; they shuttle containers and almonds to and from our farms & facilities to rail spurs and coastal ports. For shippers and trucking companies who upgrade their trucks on a regular basis, they will be out of luck in just 14 months, because the truck they need to comply with this proposed regulation is not commercially available at scale yet.

Supply chain disruption since the Covid-19 global pandemic has already created a socio-economic crisis in our community, resulting in tens of millions of pounds of almonds being sold, but not shipped or paid for, resulting in a nearly \$2B loss to our community and 110,000 employees. We fear adding this regulation at this time without option or opportunity for compliance, will further devastate our industry, our California rural communities, and our American export economy.

Please, extend the deadline for the finalized Advanced Clean Fleets (ACF) Regulation to allow more time for

industry and staff to develop workable, affordable, and timely solutions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 12:16:49

No Duplicates.

## **Comment 150 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kenia

Last Name: Zamarripa

Email Address: kzamarripa@sdchamber.org

Affiliation: San Diego Regional Chamber of Commerce

Subject: Advanced Fleet Regulations

Comment:

On behalf of the San Diego Regional Chamber of Commerce and speaking for a variety of industries and small, medium, and large employers in our region, we like to comment on the Advanced Fleet Regulations being proposed by CARB.

The passage of the North American Free Trade Agreement (NAFTA) led to the integration of the U.S. and Mexican economies through increased cross-border manufacturing and trade. Today, over 5 million U.S. jobs and over 565,500 jobs in California are supported by trade with Mexico, forming part of a complex network of cross-border and integrated supply chains. Goods cross the border back and forth multiple times before final assembly, developing one of the world's most impactful platforms.

Expanded cross-border trade has been integral to California's success as the fifth largest economy in the world. California boasts one of the world's busiest international land border crossings and the busiest between the United States and Mexico which processes 90% of California's exports to Mexico. Together, San Diego and Baja have created a \$2.5 billion co-producing manufacturing supply chain and became the largest medical device cluster in the world. Although movement across our border is not limited only to goods, much of our conversation centers around the physical infrastructure needed to support all this economic activity.

As the leading voice for business, the Chamber is committed to making the San Diego region the best place to live and work through the development of global policies that boost the economy, facilitate cross-border commerce, and strengthen international business relationships.

We believe that there is a disconnect with the proposed regulation to include small operators in the availability and pricing of ZEV truck. In addition, the regulation does not ensure the required infrastructure will be in place to handle fueling/charging ZEV trucks in important freight corridors.

Based on the foregoing, we ask that CARB provide us with the following:

The modification of the high priority definition to not include small operators that have service clients handling over \$50 million, since most major manufactures in Baja California would fall under this category.

An extension on the date of the requirement to register a new drayage truck at a maritime port until it is actually viable to purchase a ZEV truck.

Ensure a public charging/fueling station be funded and built in the vicinity of California's most important commercial land port of entry.

Provide an in-depth economic expert analysis of this proposed regulation before implementing, to avoid any potential catastrophic disruptions to our supply chains and California's economy.

We applaud and share your commitment to promote and protect public health, welfare, and ecological resources through effective reduction of air pollutants while considering equitable solutions by region. Modifying the high priority definition of ZEV truck users, an extension on the date of the requirement to register a new drayage truck at a maritime port and ensuring incentive funding programs to comply with this regulation are concrete actions that CARB can take to avoid the interruption of supply chains and inflation in our region.

Thank you for your leadership on this important manner. Please don't hesitate to contact the Chamber if we can further be of assistance.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 12:20:18

No Duplicates.



## **Comment 151 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Margaret  
Last Name: Staub  
Email Address: margarets@seamates.com  
Affiliation:

Subject: Advanced Clean Fleets Regulation (acf2022)  
Comment:

Hello,  
I'm concerned expectations for the ACF2022 to succeed will be met with extreme challenges for the following reasons: 1) as of today, there are Zero Emission trucks available that can make the R/T out of Central Valley to Port of Oakland (or LALB) on one charge. Each charge takes 6 hours. 2) there are limited charging stations at this time for trucks 3) the lightest Zero-Emission truck on the road weighs 12,000 lbs more than the average diesel truck of the same model. This means cargo weights will be reduced as much as 25-30%. Lastly, 1/01/2024 is 14+ months away. This in itself is not enough time for infrastructure changes to happen. Best to stay with the current 1/01/2035 plan to allow further planning.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 13:27:04

No Duplicates.

**Comment 152 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Erin

Last Name: Graziosi

Email Address: [egraziosi@rottenrobbie.com](mailto:egraziosi@rottenrobbie.com)

Affiliation: Robinson Oil Corp

Subject: Clean Fleet Proposed Regulation Comments

Comment:

Comments attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/167-acf2022-UzAHYFYIWWgAWVQ1.doc>'

Original File Name: CARB Advanced Clean Fleet Proposed Regulation Comments 2022.doc

Date and Time Comment Was Submitted: 2022-10-13 13:46:30

No Duplicates.

**Comment 153 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Luis

Last Name: Roa

Email Address: lroa@hgcity.org

Affiliation: City of Hawaiian Gardens

Subject: The Advanced Clean Fleets (ACF) draft regulatory Language

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/168-acf2022-UjpVMl0rAjBRPgJr.pdf'

Original File Name: Hawaiian Gardens Comments on ACF Draft\_101222.pdf

Date and Time Comment Was Submitted: 2022-10-13 13:53:11

No Duplicates.

**Comment 154 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Michael

Last Name: Murphy

Email Address: mmurphy@baaqmd.gov

Affiliation: Bay Area AQMD

Subject: BAAQMD comment letter -- Sharon Landers, Interim Executive Officer/APCO  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/169-acf2022-UjAFYgBgV3VWPVcz.pdf'

Original File Name: BAAQMD\_ACF regulation comments\_20221014\_final.pdf

Date and Time Comment Was Submitted: 2022-10-13 14:30:45

No Duplicates.

## **Comment 155 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jason

Last Name: Machado

Email Address: [jmachado@cypressca.org](mailto:jmachado@cypressca.org)

Affiliation: City of Cypress

Subject: Advanced Clean Fleets Proposal Opposition - City of Cypress

Comment:

Hello,

Please see attached a letter from the City of Cypress in opposition to the Advanced Clean Fleets Proposal.

Regards,

Jason Machado

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/170-acf2022-UDEAZVYxUFwDdQJ3.pdf>'

Original File Name: ACF Public Fleets Letter - City of Cypress - Final.pdf

Date and Time Comment Was Submitted: 2022-10-13 14:35:18

No Duplicates.

## **Comment 156 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Brett  
Last Name: Hodgkiss  
Email Address: bhodgkiss@vidwater.org  
Affiliation: Vista Irrigation District

Subject: Comment on Proposed Advanced Clean Fleet Regulations  
Comment:

Please see attached letter from the Vista Irrigation District commenting on the proposed Advanced Clean Fleet Regulations. Thank you for your consideration.  
Regards,

Brett Hodgkiss  
General Manager  
Vista Irrigation District

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/171-acf2022-VSNcMwRhUFwGY1M8.pdf>'

Original File Name: VID Comment Letter - Advanced Clean Fleet.pdf

Date and Time Comment Was Submitted: 2022-10-13 14:43:57

No Duplicates.

**Comment 157 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mary

Last Name: Staub

Email Address: mary.staub@edstaub.com

Affiliation:

Subject: Advanced Clean Fleets regulation Comment

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/173-acf2022-WzhcNVI+WGlSOwBf.docx'

Original File Name: COMBO WHOLESALE-RETAIL - CARB Advanced Clean Fleet  
Proposed Regulation 2022.docx

Date and Time Comment Was Submitted: 2022-10-13 15:33:49

No Duplicates.

## **Comment 158 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mike

Last Name: James

Email Address: mjames@elcajon.gov

Affiliation:

Subject: Comments on Proposed Advanced Clean Fleets Regulations

Comment:

Good afternoon,

Please find the attached letter to the proposed Advanced Clean  
Fleets.

Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/174-acf2022-AWJVOIAIVnwLYgFn.pdf'

Original File Name: CityofElCajonComment10.13.2022.pdf

Date and Time Comment Was Submitted: 2022-10-13 16:07:03

No Duplicates.



## **Comment 159 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Francisco

Last Name: Olivares

Email Address: 1993frankie@gmail.com

Affiliation:

Subject: Acf2022

Comment:

I am not in favor and we are all going to suffer from that. majority of the truckers would not be able to afford that kind of equipment. please reconsider!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 20:17:43

No Duplicates.

## **Comment 160 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Victor

Last Name: Navarro

Email Address: Vnavarro69@icloud.com

Affiliation:

Subject: Arb Compliance

Comment:

This law has forced me to get rid of my 2008 international truck that I've had for about 10 years. This is my second truck that I've been forced to change because of the law. The 2008 truck will be the last one because I can't afford to get another truck. I'm just one of the truck owners that this enforcement is affecting. There's many more owner operators in the same situation I'm in. This law is not only affecting me personally but my whole family because I have two daughters in the university I'm trying to help financially get through school. I also have another daughter that that has blessed me with grandkids that I would love to spend more time with and also be there financially if needed for them. This won't now be as possible. There were grants that were available but they were so difficult to get. And because of all the media in the news about this enforcement all the truck dealers spiked up their prices. The dealers have taken advantage of the situation. The pandemic has also played a big part to the inventory of trucks making it even harder to purchase a truck. I understand you want cleaner air but the new trucks are still running on the same fuel and on top of it the filter in the new trucks are also using fuel. These changes have affected so many owner operators and families livelihoods. Thank you for your time. Sincerely, Victor

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-13 20:53:02

No Duplicates.

## **Comment 161 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jeffery

Last Name: Bidwell

Email Address: marshabidwell@gmail.com

Affiliation:

Subject: Proposed Advanced Clean Fleets Regulations

Comment:

Please see the attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/178-acf2022-UTRTOFEgAD9XPgV8.docx'

Original File Name: EMPLOYEE-FAMILY-FRIEND - CARB Advanced Clean Fleet Proposed Regulation 2022 (1) Jeff.docx

Date and Time Comment Was Submitted: 2022-10-14 10:15:03

No Duplicates.

## Comment 162 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.

First Name: Greg

Last Name: Owen

Email Address: grego@trimodal.com

Affiliation:

Subject: Proposed ACF Regulation

Comment:

We are a local Trucking/warehousing company here in the Port of LA/LB area that have serviced the ports for 75 years. We have studied electrification totally for trucking & warehousing operations & fully have implemented solar panels on three of our warehouses; purchased ZET yard tractors; forklifts; are in the process of studying charging infrastructure for each of our facilities.

The cost of ZET in drayage operations will be a total failure due to EXTREME COSTS for tractors, infrastructure, generational changes, inefficiencies requiring a minimum of twice the trucks currently handling drayage operations throughout the port communities. Initial costs per tractor will be over \$1 million & times two for each current drayage haul today.

Currently California Energy Commission has no plans how to provide a 24/7 uninterrupted source of energy for current operations, let alone the future demand being proposed. The current demand being

studied are based on less than half of future demands.

CARB mandates to date have been a total failure, lack good science rules for study and implementation. The cost to industry to date have been Billions in clean units purchased, maintained and destroyed by past, current and future draconian rules/mandates.

Future purchases will be multi-billions:

1.

Past clean truck implementation cost \$1.5 billion

2.

Future cost \$15.4 Billion

3.

Infrastructure estimated \$9 million per facility

Nothing makes sense or is feasible without

& SUBSIDIES; a future without subsidies will be failure upon failure.

The use of ZET and the infrastructure, without the energy production infrastructure is not possible. We have done more than most users with our past purchases and implementation; the future additions lack financial feasibility or possibility.

CARB has the cart before the horse, first you should have decided what you wanted to do; how you will provide the energy to offset the demand; put the infrastructure in place; then, proceed that ZET will reduce the cost of what its replacing.

Greg Owen, Head Coach

Ability-Trimodal

2011 East Carson Street

Carson, CA. 90810

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-14 10:17:44

No Duplicates.

## **Comment 163 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: james

Last Name: O'Neill

Email Address: joneill@oneilllogistics.com

Affiliation: O'Neill Logistics

Subject: advanced clean fleet rule

Comment:

The proposed requirements with the advanced clean fleet for drayage trucks 1/1/2024 is not workable. There are not enough fueling or charging stations available to the public . The state has electric grid power supply issues which will effect our trucks if they can not be charged at all diffrent hours . The backlog to get power companies to even insatll power on a premiss is 18 months . These rules are putting added expense and hardship on all trucking comapnies and it threatens the ability to keep our ports functioning .

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-14 10:21:15

No Duplicates.

## Comment 164 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.

First Name: David

Last Name: Atwater

Email Address: president@gofds.com

Affiliation:

Subject: Comments on the Proposed ACF Regulation

Comment:

CARB "Clean Trucks" Rule

Comments For Record

Here we go again... Like the original "Truck and Bus Rule" that broke many Companies, (almost ours too) we have to change out our fleet with our money, on a government required timeline, with "future" technology without infrastructure available, in a plan built on pipe dreams and guesstimates about what the government power brokers want us to do.

Remember CARB's MTBE debacle? CARB

denies their involvement as they just required a "specification" that could only be met with MTBE at the time. This created

statewide pollution issues, some of which are still being cleaned up! CARB did not pay

for that! Or how about methanol fuels in bus fleets? It rotted the motors from the inside out and was poisonous to humans costing CARB hundreds of millions of dollars to essentially force bus fleets to use the fuel and keep replacing engines?

Or what about hydrogen cars where the fuel was made from natural gas? A few

bucks spent there over how many years? How many other examples are there?

Here is my primary groups of issues, in no particular order:

First: We don't have

the supply of electricity in the State needed for this government required transition.

And yes, I have 1200 solar panels on my property...

but that is one property, headquarters, not the other 10 places I have trucks parked around Central California. By the way, I also had to put in a 250KW generator to keep my business running when the power goes out as without the Renewable Diesel generator, I cannot run off my solar power, that I have had for over 16 years (closer to end of life than I realized).

Second: These electrified trucks

will not have a smaller environmental impact on the planet than the Renewable Diesel powered trucks we run now. But there will be a GIANT COST! This is a

political decision, not a scientific one, similar to solar panels which are not recyclable, and windmills, that are bird killers and not recyclable either, but why look at facts. What is the fine for each bird killed, the cost of picking up the ones you notice? If I killed an eagle, I

would be put in jail. All CARB's "fines" start at

\$10,000 per violation, how many birds have died for this eyesore of

so called "clean" power.

Third: All the battery minerals and components have to be imported from China, need I say more...National Security. It takes about 500,000 pounds of mining to provide the minerals to make a 1,000 pound car sized battery. How much mining is needed when you require SUPERSIZING of these batteries for truck use?

Clearly CARB does not mind if the pollution from mining that occurs in a third world country with child and slave labor.

Fourth: If we took all the trucks in one mid-sized county and electrified them today, it would take all the power available for every residence in the State

Fifth: It takes how many hours to charge a class 8 truck hauling 80,000 pounds all day? Is it all night? MY fleet runs these trucks

around the clock as it is the only way to make money off of the huge investment that CARB and other Regulators have pushed the pricing of these trucks to!

So, will I need a Day Fleet and a Night Fleet, so that I can be charging one while the other is running? Doubling the size of my fleet? IS that a

savings? Is doubling the number of vehicles needed to do the same work environmentally friendly?

Sixth: One will never be able to load an electric powered truck transporting flammable or combustible liquids as they can never be shut off or de-electrified during loading.

Static Electricity, for the same reason, we cannot even have a cell phone on at loading terminals! That is an AHA moment! I know what will happen,

cell phones will continue to not be allowed but you will make sure that "special rules" will be quietly forced allowing your giant static generators with constantly running electric systems, including fans, be allowed access to load at any time. Probably by

declaring the equipment "explosion proof" as all electrical systems are required to be in terminals and refineries.

Seventh: There is no available FAST charging infrastructure available for heavy duty trucks nor enough power from the starved Statewide grid, with no capacity in the power lines in the streets as they were not built with this load in mind, with no charging stations at our terminals. What is all this infrastructure going to cost? Then what can I connect those systems into? What will my power bill be for fast charging? More than overnight parking, but we don't park day or night.

Eighth: The batteries are non-recyclable and must be replaced regularly. As will my solar panels in a few years. A big dump run coming ... will CARB be helping me pay to replace them? Is the future cost of recycling built into your models? The stupidest thing on the planet is that we still bury our "waste" In a previous life I used

to sell car batteries that to this day are still over 90% recyclable. I bet

that I could never acquire a permit to build a plant to recycle these electric car batteries in California, even if the technology existed!

Ninth: Our power grid is



shrinking, not growing! The same people that are desperate for electrification of transportation want Diablo Canyon, with 2.256 Gigawatts of power, to be closed 25 years early, AND the same people want all the dams in the State removed, they used to generate some power also.

Have we also forgotten about high speed rail to nowhere? It will

demand a lot of power to run 250 miles per hour from San Francisco to Los Angeles! The first section of track will run \$100 billion before it is complete.

Tenth: CARB is picking winners

and losers economically with no free market involvement. Tesla has gotten many BILLIONS of dollars and still almost went broke, and the owner is now the richest man in the world. Their cars have been the worst built, ranked by

independent studies, for years, but you love them, and continue to &ldquo;sponsor&rdquo; them.

Without huge subsidies, electrification would die quickly as the free market recognizes that &ldquo;market technology&rdquo; is not really there yet.

So, CARB&rsquo;s response is &hellip;.. let&rsquo;s force it. Like the

Governor&rsquo;s ICE ban.

Eleventh: With all that will need to

be spent to make this Truck rule eventually happen, from power, to grid, to vehicles, the State could give every homeless person in the State support and a place to live for life which actually might be more environmentally friendly due to the elimination of the environmental impact that results from homelessness.

CARB is so myopic in its focus. People are actually dying on the streets every day, contrary to your &ldquo;statistical estimates&rdquo; of possible lives saved. Do we have our priorities straight here? CARB&rsquo;s is clearly

focused on power and politics, &ldquo;how do we best justify the control we want over every single facet of the lives of people in CARB&rsquo;s serfdom&rdquo; rather than basing decisions on the science.

I have one important thought and comment that needs to be made in light of recent news of major disasters that befall us in California and across the country; that is, having all of our emergency response &ldquo;eggs in one basket&rdquo; namely electric light, medium, and heavy duty electric vehicles needed for emergency response.

As a Company that has always been there through earthquakes, major snow events, huge deadly fires, and floods AND PANDEMICES, we have been participating in emergency response preparedness for decades.

I know that electrification of emergency and other response vehicles will make any disaster recovery and response much worse in life and death situations. In most, if not all of the disasters experienced in our State, one of the first effects experienced is that the electrical grid goes down. Hence the requirement for back-up power for hospitals, police facilities, California&rsquo;s Office of Emergency Services, and media outlets to name but a few, that also includes OUR solar powered offices with a standby 250KW generator that is regularly utilized often in area outages to keep our systems and equipment coordination running.

Just consider last month when the Governor was telling those with electric vehicles to not charge them due to overwhelming grid stresses.

This was not even coupled with another disaster, like a fire

or earthquake&hellip;. or any other disaster where major response is required.

With electric vehicles you cannot &ldquo;get there from here!&rdquo; EVEN in that grid demand problem we experienced, our companies were involved working to keep power plants up with what they needed to generate power at record levels. We CAN deliver fuels and products needed without electricity as all our vehicles are independently powered and carry fuel that is turned into power without electricity or using standby power. We cannot use electric vehicle to fill those roles. THE ASK: Please exempt ALL vehicles that work to keep our State operating during crises. That would include: Fire Trucks, Ambulances, Police vehicles, utility vehicles, the many State, County, and local agencies vehicles that respond when disaster strikes.

Exempt all the vehicles that deliver food prepared and grocery and fuel as these vehicles provide fuel for evacuations, and response and food to keep people alive right now. The list would be large but the need during these events would be immediate and demand all resources available to preserve human life and health.

I appreciate your thoughts to make commute and local errand cars less polluting but using a broad brush to shut down emergency response vehicles, food and fuel deliveries and support vehicles for example, lacks adequate consideration of the redundancy needs required for large crises.

Remember, in all large emergencies, it is ALWAYS, &ldquo;All Hands on Deck.&rdquo;

David Atwater

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-14 10:49:27

No Duplicates.

**Comment 165 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Bascomb

Last Name: Grecian

Email Address: bascombg@gmail.com

Affiliation:

Subject: Californians Love Fossil Fuels

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/182-acf2022-AWJXMFwvBzYFXAFg.pdf'

Original File Name: CARB Advanced Clean Fleet Proposed Regulation 2022 PDF1.pdf

Date and Time Comment Was Submitted: 2022-10-14 10:32:54

No Duplicates.

## **Comment 166 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Dominick

Last Name: Lee

Email Address: dominick@pcclogistics.com

Affiliation: Pacific Coast Container Inc. PCC

Subject: ACFR 2022 Comments

Comment:

Re: Proposed Advanced Clean Fleet Regulations  
(ACFR 2022)

Dear Members of the California Air Resources Board  
(CARB),

We are submitting the following comments on your Proposed Advanced Clean Fleet Regulations, as a Motor Carrier, Broker and a Warehouse service provider based in LA/LGB and Oakland, Ca.

We understand the goal of California and the desire to advance the clean air initiatives, especially in and around the maritime facilities in our state. We are based at both above-mentioned maritime area with facilities and employees that breathe the air every day. Although, we agree that the Ports need to evolve and meet the goal of reducing emissions to bring about an environmentally cleaner workplace; the burden seems to always fall onto the operators and especially the truck operators currently servicing the maritime industry at these facilities. The proposed regulation, despite grants and assistance, puts an enormous burden on companies like PCC and the drivers that have worked with us for multiple decades.

We ask you to reconsider the following:

Termination of 2008-2010 Legacy trucks at the end of 2022.

Although many of the contracted carriers for PCC have upgraded their equipment to qualify for the Legacy provisions of the proposed ACFR; there are many who have been priced out of this upgrade due to the Post Covid supply chain issue that has minimized the available used trucks in the market. Many have argued that truckers have had ample time to adjust to this regulation and being unable to qualify at the last hour is irresponsible. Although, all the truckers have been aware of the schedule for truck termination; we can all agree that the past three years have not been "normal" or expected by anyone. The pandemic has brought forth numerous extenuating circumstances including inflation, reduction of available trucks and inability, especially older truckers, to work a regular schedule due to family and medical concerns.

We respectfully request that an extension of a reasonable period is granted until the supply chain issues and used compliant truck markets are normalized for these drivers. Class A truck drivers are in shortage everywhere in the United States and to force these qualified Port drivers to seek employment outside our state is a losing proposition for the maritime industry and the State of California.

Zero Emission Truck Requirement for Drayage  
Truck Registry post 12/2023

The proposal to lock out diesel emission trucks regardless of the MYE or MY by the end of the next year is unreasonable and unachievable due to lack of infrastructure, limited performance of ZEVs and the current cost of upgrade.

After next calendar year, the proposed ACFR would limit any new trucks to the registry to be Electric or Hydrogen thus qualifying as a ZEV under the CARB definition. The unproven performance and current specification of the ZEVs are unfit for services offered at the Port.

The lack of charging infrastructure, availability of power grid, lack of Hydrogen stations and the gross weight of the vehicles compromise trucking companies' ability to deliver service to the California consumers.

The Ports in CA and the distribution centers located in our state rarely operates on a 24-hour basis. This translates to all port related trucks needing a charge at the same period (mainly overnight). The infrastructure needed

for number of ZEVs proposed would take years to build and be made available for the amount trucks that would populate the Ports located in CA. In the

past month, during the heat wave, we were advised to turn power down due to the strain on our power grid. Are we ready to place thousands of charging stations in a concentrated area?

Although, Hydrogen has been offered as an option, there are very few hydrogen stations available in our state to make this option viable. Charging/Fueling options

need to be solidified prior to announcing any compliance date with zero emission vehicles. Although the proponents argue they can be built, we have very little confidence that the hydrogen/charging infrastructure can be built by the end of 2023.

The weight of the ZEVs is of great concern to all truck operators. The

average ZEV is 8,000 to 11,000 above the normal diesel rigs in operation today. The

80,000 GVW or 82,000GVW for ZEVs is grossly inadequate for the payload coming into our ports. We would have to ask our customers to decrease their cargo weight (pay load) by 6,000 to 9,000 lbs. to accommodate the extra weight of these vehicles. We are unaware of any legislative or administrative relief to address this issue. This is a gross inequity to the exporters of CA as they would have to decrease their exports due to the limitation of the trucks proposed by CARB. Asking customers to send less is a sure way to chase commerce out of CA.

Port Truckers are an asset to our state. The smaller fleets that have serviced the Maritime industry for decades will be phased out of the industry due to the cost of upgrading to a ZEV fleet. Port Truckers are a specialized occupation in our industry as they possess the skills

to process the administrative burden put forth by international trade, security clearances that are necessary to enter secured areas designated by Homeland Security and the ability to navigate the challenges at the Marine and Rail terminals. The inability to purchase trucks that are 2 to 4X the current cost of diesel trucks will devastate the driver pool that is already challenged by lack of applicants.

The ACFR proposal to lock out diesel units by end of next year is unrealistic and will cause disruptions beyond imagination. We respectfully submit that this policy be reviewed and delayed until infrastructure and weight issues are resolved.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-14 11:03:15

No Duplicates.

## **Comment 167 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mike

Last Name: Mohajer

Email Address: taskforce@dpw.lacounty.gov

Affiliation:

Subject: COMMENTS ON THE ADVANCED CLEAN FLEET PROPOSED REGULATIONS

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/184-acf2022-WzJSI1I+UHdWNgZZ.pdf'

Original File Name: IWMTF 45 day Comments on the ACF Regulations.pdf

Date and Time Comment Was Submitted: 2022-10-14 11:17:00

No Duplicates.

## **Comment 168 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Robert

Last Name: Ackerman Jr

Email Address: Non-web submitted comment

Affiliation:

Subject: ACF

Comment:

Please see the attached file

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/185-acf2022-WzpRNAFmVypWIAhs.pdf>'

Original File Name: ACF.pdf

Date and Time Comment Was Submitted: 2022-10-14 12:03:37

No Duplicates.



## **Comment 169 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mike

Last Name: Joyce

Email Address: joyce@aalafleet.com

Affiliation: American Automotive Leasing Association

Subject: Proposed Advanced Clean Fleets Regulation Comments of American Automotive Leasing Associat

Comment:

Attached please find comments of the American Automotive Leasing Association (AALA) on the proposed Advanced Clean Fleets regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/186-acf2022-VDUAZwRpUGILUIU2.pdf'

Original File Name: AALA CA CARB Advanced Clean Fleet Comments 10.14.2022.PDF

Date and Time Comment Was Submitted: 2022-10-14 12:05:19

No Duplicates.

## **Comment 170 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Theresa

Last Name: Romanosky

Email Address: tromanosky@aar.org

Affiliation: Association of American Railroads

Subject: Comments of the Association of American Railroads

Comment:

Attached please find the comments of the Association of American Railroads.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/187-acf2022-VmdSZFBgVDNQZFdn.pdf'

Original File Name: 10142022 AAR Comment on Advanced Clean Fleets Regulation.pdf

Date and Time Comment Was Submitted: 2022-10-14 12:08:55

No Duplicates.

## **Comment 171 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ashley

Last Name: Grijalva

Email Address: Non-web submitted comment

Affiliation:

Subject: Fix the ACF

Comment:

Please see attached file

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/188-acf2022-AWdRP1YvVVkEdgZu.pdf'

Original File Name: Fix the ACF (2022).pdf

Date and Time Comment Was Submitted: 2022-10-14 13:10:15

No Duplicates.

## **Comment 172 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Allen

Last Name: Genetti

Email Address: Non-web submitted comment

Affiliation:

Subject: Fix the ACF

Comment:

Please see the attached file

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/189-acf2022-WjxSPV1rUV1QIgZu.pdf>'

Original File Name: Fix the ACF (2022) 2.pdf

Date and Time Comment Was Submitted: 2022-10-14 13:15:34

No Duplicates.

## **Comment 173 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Dan

Last Name: Vander Pol

Email Address: Non-web submitted comment

Affiliation:

Subject: Fix the ACF

Comment:

Please see the attached file

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/190-acf2022-Wz1VOlMqAw8CcABo.pdf'

Original File Name: Fix the ACF (2022) 3 DVP.pdf

Date and Time Comment Was Submitted: 2022-10-14 13:18:12

No Duplicates.

## **Comment 174 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ashley  
Last Name: Remillard  
Email Address: ashley.remillard@hexagonagility.com  
Affiliation: Hexagon Agility

Subject: RE: Proposed Advanced Clean Fleets Regulation  
Comment:

October 14, 2022

The Honorable Liane Randolph October 17, 2022  
Chair, California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Proposed Advanced Clean Fleets  
Regulation

Dear Chair Randolph:  
As Vice President of Legal and Government Affairs at Hexagon Agility, Inc. ("Hexagon Agility"), I am writing to provide comments on the California Air Resources Board's ("CARB") proposed Advanced Clean Fleets Regulation ("ACF"). While Hexagon Agility supports CARB's leadership on environmental matters, we are concerned that the current proposed ACF could result in a significant missed opportunity to reduce greenhouse gases ("GHG") by failing to include vehicles powered by renewable natural gas ("RNG") within the scope of the ACF and only allowing utilization of g electric and fuel cell vehicles to satisfy the ACF requirements. Further, Hexagon Agility encourages CARB to not ignore the role that RNG can play in delivering steep carbon reduction.

As background, Hexagon Agility is the leading global provider of highly engineered and cost-effective compressed natural gas, liquid natural gas and propane fuel systems and Type 4 composite cylinders for medium- and heavy-duty commercial vehicles. Our solutions enable the safe and effective use of natural gas and propane as transportation fuels. These clean fuels reduce GHG and other harmful emissions and save money for fleet operators and their customers. Additionally, Hexagon Purus, a Hexagon Agility affiliate, is a world leading provider of complete vehicle systems and battery packs for hydrogen fuel cell electric and battery electric vehicles including hybrid mobility applications on light, medium, and heavy-duty vehicles, transit buses, ground storage, distribution, maritime, rail, and aerospace.

Hexagon Agility is uniquely situated to offer a neutral prospective on the current clean-energy marketplace. RNG-fueled trucks remain the most widely available option to reduce GHG and NOx emissions and including this near-zero

technology in the ACF would make an immediate impact on GHG emissions in our state. RNG technologies are 90 percent cleaner than diesel and, unlike the lack of commercially available electric and fuel cell trucks, RNG fuel systems are readily available to help achieve NOx and toxic emissions reduction goals. While we look forward to the ultimate transition to zero emission vehicles, Hexagon Agility advises CARB to acknowledge the real, legal, and technical impediments present on the proposed ACF rulemaking and further urges CARB to take the below concerns into consideration.

1. Hexagon Agility has concerns regarding the appropriateness of the U.S. Environmental Protection Agency ("EPA") granting a section 209 waiver for fleet mandates, and doubt that such a mandate will survive a challenge by impacted businesses. A reasonable interpretation of section 209(b) does not give California authority to regulate fleet purchases. And, even if it does extend to fleet requirements, the authority is not unchecked by the Clean Air Act and the Energy Policy Act of 1992.

2. The ACF implicitly mandates that fleets install infrastructure. As the ISOR and regulation is currently stated, it presumes that CARB has the legal authority to mandate fleets install fueling infrastructure; that fleets have the necessary footprint to accommodate fueling\charging infrastructure; and that the nearby electrical infrastructure can support medium- and heavy-duty trucks congregated at these locations. The rule accommodates delays but does not set out the legal authority that CARB is basing its presumed authority to mandate that fleets install fueling.

3. The ACF does not provide exemption for costs. If the estimates are off, then fleets should be able to request an exemption to be consistent with the Clean Air Act's theme of technology being feasible and cost-effective.

4. The ACF should allow fleets that have invested in low-carbon fuels to continue to use these fuels and low-NOx technology so long as such fuels continue to be available for purchase. We urge CARB to allow a separate pathway for early adopter fleets that have been purchasing low-NOx natural gas vehicles and using low-carbon, RNG so that they can continue to do so, so long as they can demonstrate that RNG is still available and effective.

Accordingly, Hexagon Agility encourages CARB to incorporate the recommended changes that we and many other organizations have put forward to improve the ACF. We appreciate your consideration of the foregoing comments.

Sincerely,  
Ashley Remillard  
Vice President,  
Legal

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/191-acf2022-AWISMVEoUGIEZVc4.pdf>'

Original File Name: Hexagon Agility - Proposed Advanced Clean Fleets Regulations (10-14-22).pdf

Date and Time Comment Was Submitted: 2022-10-14 13:39:59

No Duplicates.



## **Comment 175 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Alex

Last Name: Oseguera

Email Address: aoseguer@wm.com

Affiliation: WM (Waste Management)

Subject: WM Comments - Proposed Advanced Clean Fleets Regulation

Comment:

I  
want to thank the California Air Resources Board (CARB) for taking  
the time to review Waste Management's (WM's) comments  
pertaining to the Advanced Clean Fleets (ACF) Regulation.  
Attached please find our letter with comments and  
recommendations.

Thanks,

Alex Oseguera

WM -

Director of Government Affairs - California, Hawaii

aoseguer@wm.com

209-327-5017

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/192-acf2022-UGJTZVxvUDEBKgMy.pdf'

Original File Name: 2022-10-14-WMCommentsACF.pdf

Date and Time Comment Was Submitted: 2022-10-14 13:41:14

No Duplicates.

## **Comment 176 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Rodrigo

Last Name: Saldivar

Email Address: Non-web submitted comment

Affiliation:

Subject: Fix the ACF

Comment:

Please see attached file

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/193-acf2022-UzVcM1UsVVkDcQlh.pdf'

Original File Name: Fix the ACF 4.pdf

Date and Time Comment Was Submitted: 2022-10-14 14:21:47

No Duplicates.

**Comment 177 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Chris

Last Name: McGlothlin

Email Address: [chris@agprocessors.org](mailto:chris@agprocessors.org)

Affiliation: Director of Technical Services

Subject: Comments on the Proposed Advanced Clean Fleets Regulation

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/194-acf2022-VjcCZ1UyAAwGYwNs.pdf>'

Original File Name: ACF Comments.pdf

Date and Time Comment Was Submitted: 2022-10-14 15:27:48

No Duplicates.

## **Comment 178 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: GRACE

Last Name: Castaneda

Email Address: gcastaneda@bestdrayage.com

Affiliation: Best Drayage

Subject: Fix the ACF (acf2022)

Comment:

Good Afternoon,

To who it may concern:

I appreciate the opportunity to provide public comment on the Proposed Advanced Clean Fleets Regulation (ACF).

On behalf of the trucking community we ask that you reconsider and revisit this proposition, as not only would this cripple the trucking industry, this would also have an impact on shippers, growers and customers all over the world. Unfortunately, there are no Zero Emission trucks that would be ideal for our type of fleet based on the weights of trucks alone. There are also no charging stations available near the port, which would cause delays and missed deadlines at the terminal.

We urge you to amend the ACF regulation for more flexibility so that the regulation catches up with technology and not technology catching up with the regulation.

Thank you,

Grace Castaneda

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-14 15:37:14

No Duplicates.

## **Comment 179 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Samantha  
Last Name: Argabrite  
Email Address: sargabrite@simivalley.org  
Affiliation: City of Simi Valley

Subject: City of Simi Valley's Comments on the Proposed ACF Regulations  
Comment:

Attached, please find the City of Simi Valley's comments on the proposed ACF regulations for consideration.  
Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/196-acf2022-VDcHaAN2V30HXgJt.pdf'

Original File Name: City of Simi Valley - ACF Comments.pdf

Date and Time Comment Was Submitted: 2022-10-14 16:01:45

No Duplicates.

## **Comment 180 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation: Rural County Representatives of CA

Subject: Proposed Advanced Clean Fleets Regulations

Comment:

Attached please find RCRC's comments on the Proposed Advanced Clean Fleets regulations.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/197-acf2022-BWZUM1QnVWRXDgJy.pdf'

Original File Name: CARB\_Proposed Final ACF Rule\_COMMENTS\_2022-10-17.pdf

Date and Time Comment Was Submitted: 2022-10-14 16:34:25

No Duplicates.

## **Comment 181 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Macy  
Last Name: Neshati  
Email Address: MNeshati@ushybrid.com  
Affiliation: US Hybrid

Subject: Accelerating emissions benefits under ACF  
Comment:

Please find our comment letter attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/198-acf2022-ViMBdF0DVW5VKgdl.pdf'

Original File Name: US Hybrid\_ACF comments\_10.14.22.pdf

Date and Time Comment Was Submitted: 2022-10-14 16:56:36

No Duplicates.

## **Comment 182 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ramon

Last Name: Martinez

Email Address: Ramimar01@hotmail.com

Affiliation: Port driver

Subject: Stop carb emissions!

Comment:

I have been a truck driver for 7 years and a port driver for 4 of them I currently own a 2012 truck with def and I thought i was good but yet a couple months later you guys change the rules again now you guys want electric vehicles which is going to cost us a lot of money. We are bearly making a living with these port prices and fuel why would we want an electric truck that can only go 300 miles! Just from Fresno and back it's 360 you expect us to park and charge up for hours &#129318;&#127997;&#9794;&#65039; please help us and stop changing so much emissions. You want the world to b a better place shut down all the companies who throw bad air 24/7 not the truckers who feed you day in and out !

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-14 19:46:52

No Duplicates.



## **Comment 183 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Will

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association

Subject: Health Groups Call for Stronger ACF rule

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/200-acf2022-AGgAY1Q0VGsAclA4.docx'

Original File Name: Health Groups Call for Stronger ACF Rule\_10.14.22.docx

Date and Time Comment Was Submitted: 2022-10-14 19:55:40

No Duplicates.

## **Comment 184 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Edward  
Last Name: Wondergem  
Email Address: wondergeme@scfuels.com  
Affiliation: SC Fuels

Subject: Advanced Clean Fleets Regulation  
Comment:

Please find attached SC Fuels comments on the proposed Advanced Clean Fleets regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/201-acf2022-VzZQMIYhADIHb1Ix.pdf'

Original File Name: Advanced Clean Fleet Proposed Regulation Letter Submission 10-14-22.pdf

Date and Time Comment Was Submitted: 2022-10-14 20:05:37

No Duplicates.

## **Comment 185 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mary

Last Name: Couchman

Email Address: Couchmanranches@gmail.com

Affiliation:

Subject: Advanced Clean Fleets

Comment:

Please, please give the ag sector more time to adhere to this new regulation. In order to move food from point A to point B has been very difficult these two last years. With the California docks being Strong Unions, we have struggled to make any sustainable living. Add to that, our lack of adequate water in CA, and we can't produce food as we used to. Do we make food for nothing? We need grace to get food to their ports and final destinations.

Mary Crane Couchman

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-14 21:23:04

No Duplicates.

**Comment 186 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Brigitta

Last Name: Van Der Raay

Email Address: bvanderraay@cox.net

Affiliation: Climate Reality Project, Santa Barbara

Subject: STRENGTHEN ADVANCED CLEAN FLEETS REGULATION

Comment:

Please see attached file.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/203-acf2022-BWYGYVckV2YLUgIw.pdf'

Original File Name: CARB 2022 re Advance Clean Fleets Rule, CRP Santa Barbara.pdf

Date and Time Comment Was Submitted: 2022-10-14 22:34:15

No Duplicates.

## **Comment 187 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Juan Carlos

Last Name: Mariscal

Email Address: juancmariscal@yahoo.com

Affiliation:

Subject: CARB rules.

Comment:

I am writing to say that the new rules about having to purchase a new electric vehicle are unfeasible and uninformed. I am a port driver and can barely make ends meet. I live pay check to pay check, I will not buy an electric truck because I can not afford one. Fuel prices are through the roof, we all know there isn't enough electricity to power so many electric vehicles, specially big rig vehicles. We already have the DEF systems on our trucks. You are pushing an idea way too soon. We understand about going electric but what you are proposing is too soon. You will put not only many drivers in poverty but the state of California in jeopardy. From unemployed people to the lack of electricity. Prices are already crazy expensive and now you are expecting people to go out and buy new electric trucks, this will not happen. Also the current electric trucks that are out there can not keep enough charge to do the work that is required in one shift. Are you going to make work days 2 to 4 hours a day? Please inform yourselves on this topic. You are playing with many many peoples lives.  
Thank you  
Juan Carlos Mariscal

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 05:59:32

No Duplicates.

## **Comment 188 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jason  
Last Name: Cole  
Email Address: colejason10@gmail.com  
Affiliation:

Subject: Opposition for Advanced Clean Fleets  
Comment:

October 15,  
2022

Clerk of the  
Board  
California Air  
Resources Board  
1001 I Street,  
Sacramento, California 95814

RE: Title 13.  
Public Hearing to Consider Proposed Advanced Clean Fleets  
Regulation

I write in strong opposition to the proposed Advanced Clean Fleets rule as I believe it will have significant negative ramifications on the state of California. Mandating the transition to zero emission fleets, at a time when there is limited and an extremely costly supply on the market for heavy duty ZEVs, a lack of comprehensive infrastructure in the state, and we are grappling with an unreliable grid, will only serve to drive up the costs of all goods in the state, and increase the cost of living for many of us who are just trying to survive. It will also create immense uncertainty surrounding the availability of goods, many of which are critical necessities, if these ZEV heavy duty vehicles cannot travel at a comparable distance to their internal combustion engine counterparts. Breaks or bottlenecks in our supply chains will have extensive consequences on the economy, which could create shortages and further increase the price of goods. This proposal will be the most damaging to our most vulnerable communities and residents in the state. I am deeply concerned with how the implementation of this regulation, and the corresponding spike in prices for goods and fuel due to the increased costs of operating heavy duty ZEVs, will impact our seniors on fixed incomes, commuters who must travel far distances to get to work because they are priced out of the cities in which they work, and every Californian who will have to bear the brunt of increased electrical bills, but most notably, our low-income households. For these reasons, I respectfully oppose the adoption of the Advanced Clean Fleets rule. Sincerely,  
Jason Cole

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 09:46:42

No Duplicates.

## **Comment 189 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Andrea  
Last Name: Cole  
Email Address: drea18@gmail.com  
Affiliation:

Subject: Opposition for Advanced Clean Fleets!! Bad policy  
Comment:

October 15,  
2022

Clerk of the  
Board  
California Air  
Resources Board  
1001 I Street,  
Sacramento, California 95814

RE: Title 13.  
Public Hearing to Consider Proposed Advanced Clean Fleets  
Regulation

I write in strong opposition to the proposed Advanced Clean Fleets rule as I believe it will have significant negative ramifications on the state of California. Mandating the transition to zero emission fleets, at a time when there is limited and an extremely costly supply on the market for heavy duty ZEVs, a lack of comprehensive infrastructure in the state, and we are grappling with an unreliable grid, will only serve to drive up the costs of all goods in the state, and increase the cost of living for many of us who are just trying to survive. It will also create immense uncertainty surrounding the availability of goods, many of which are critical necessities, if these ZEV heavy duty vehicles cannot travel at a comparable distance to their internal combustion engine counterparts. Breaks or bottlenecks in our supply chains will have extensive consequences on the economy, which could create shortages and further increase the price of goods. This proposal will be the most damaging to our most vulnerable communities and residents in the state. I am deeply concerned with how the implementation of this regulation, and the corresponding spike in prices for goods and fuel due to the increased costs of operating heavy duty ZEVs, will impact our seniors on fixed incomes, commuters who must travel far distances to get to work because they are priced out of the cities in which they work, and every Californian who will have to bear the brunt of increased electrical bills, but most notably, our low-income households. For these reasons, I respectfully oppose the adoption of the Advanced Clean Fleets rule. Sincerely,  
Andrea Cole



Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 10:34:18

No Duplicates.

## **Comment 190 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Dan  
Last Name: DeWitt  
Email Address: dan.dewitt@edstaub.com  
Affiliation: Ed Staub & Sons

Subject: Notice of Public Hearing to Consider Proposed Advanced Clean Fleets Regulation  
Comment:

Ed Staub &  
Sons  
10/15/2022

Clerk of the Board  
California Air Resources  
Board  
1001 I Street, Sacramento,  
California 95814

RE: Title 13. Public  
Hearing to Consider Proposed Advanced Clean Fleets  
Regulation

Ed Staub & Sons  
respectfully opposes the  
adoption of the Advanced Clean Fleets rule as it attempts to  
transition the transportation and goods movement economy much too  
quickly without sufficient regard for the necessary infrastructure  
overhaul in the state, a realistic consideration of the  
state's power grid capabilities, and the lack of an adequate  
and accurate cost analysis.

The regulation's proposed  
timeline will place significant strain on the transportation  
industry and gravely hamper goods movement in the state.  
Additionally, the cost of replacing fleets with entirely zero  
emissions vehicles will unduly harm small businesses in the state,  
many of which are family- and minority-owned. With the limited  
supply and options for heavy duty ZEVs, large companies with  
greater capital will be prioritized by manufacturers as compared to  
their small business counterparts. The highly restrictive timeline  
that has been proposed will only serve to further exacerbate this  
problem in the market.

Additionally, significantly  
increasing the operating costs of the transportation and goods  
movement sector within the state will ultimately harm our most  
vulnerable communities and residents the most. Low-income  
households in the state are already bearing the brunt of increased  
electricity costs,[1] which  
will only be further intensified by the adoption of this regulation  
as our unreliable grid continues to be strained beyond capacity. As  
a small business who takes great pride in serving our community,  
the impacts of the proposed regulation on the costs of goods and  
necessities, such as food, water, and fuel, are of grave concern.

Ed Staub & Sons  
also has significant concerns  
because the regulation does not sufficiently consider the current  
and future needs of the transportation industry within the state.  
The range of the vehicles that are currently offered on the market  
will not ensure a seamless transition, as many heavy duty vehicles  
are often used nearly continuously to ensure the timely delivery of  
goods to other businesses and consumers. Moreover, the  
infrastructure necessary to support a full transition to zero  
emission fleets is not prevalent enough to serve the vast number of  
vehicles CARB intends to replace. This regulation will be a major  
disruptor to the state's supply chains, which will increase  
the cost of goods at every level.

We urge the Board to consider  
the deeply unsettling ramifications of bottlenecks in our fuel,  
food, water, and medical supplies, in addition to every industry  
that moves goods on heavy duty vehicles within the  
state.

For these reasons, we must  
respectfully oppose the adoption of the Advanced Clean Fleets rule.

Sincerely,

Dan  
DeWitt  
Ed Staub &  
Sons  
Director of  
Operations

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 12:15:02

No Duplicates.

## **Comment 191 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Nancy

Last Name: Such

Email Address: N.such@comcast.net

Affiliation:

Subject: Clean fleet vehicles

Comment:

This is  
a very bad idea and not well thought out. The electric charging  
infrastructure is not present in California to accomplish  
this. The cost of  
EVERYTHING will rise and people of California will not able to  
afford to live here. More people and businesses will leave  
the state to live and work in states without this mandate. I  
am against this plan and think it is one of the worst ideas for  
this state. Let things happen organically, stop putting in all  
these mandates.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 13:58:54

No Duplicates.

## **Comment 192 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jed A.

Last Name: Hendrickson

Email Address: jedhendrickson@gmail.com

Affiliation:

Subject: Oppose advanced clean fleets regulation

Comment:

I oppose all regulation directed by CARB. Unelected bureaucrats should not be allowed to exercise such authority. This only belongs to the legislature.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 14:17:46

No Duplicates.

## **Comment 193 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Scott

Last Name: Moody

Email Address: smooty@swo2020.com

Affiliation:

Subject: acf2022

Comment:

I urge to to reconsider this proposal. This will place an undue financial burden on those of us trying to run a business.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 15:12:48

No Duplicates.

## **Comment 194 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Brad  
Last Name: Staub  
Email Address: brad.staub@edstaub.com  
Affiliation:

Subject: Ridiculous proposal for zero emission trucks  
Comment:

Brad Staub  
Clerk of the Board  
California Air Resources Board  
1001 I Street, Sacramento, California 95814  
RE: Title 13. Public Hearing to Consider Proposed Advanced Clean  
Fleets Regulation  
I write in strong opposition to the proposed Advanced Clean  
Fleets rule as I believe it will have  
significant negative ramifications on the state of California.  
Mandating the transition to zero emission  
fleets, at a time when there is limited and an extremely costly  
supply on the market for heavy duty ZEVs,  
a lack of comprehensive infrastructure in the state, and we are  
grappling with an unreliable grid, will  
only serve to drive up the costs of all goods in the state, and  
increase the cost of living for many of us  
who are just trying to survive.  
It will also create immense uncertainty surrounding the  
availability of goods, many of which are critical  
necessities, if these ZEV heavy duty vehicles cannot travel at a  
comparable distance to their internal  
combustion engine counterparts. Breaks or bottlenecks in our  
supply chains will have extensive  
consequences on the economy, which could create shortages and  
further increase the price of goods.  
This proposal will be the most damaging to our most vulnerable  
communities and residents in the state.  
I am deeply concerned with how the implementation of this  
regulation, and the corresponding spike in  
prices for goods and fuel due to the increased costs of  
operating heavy duty ZEVs, will impact our  
seniors on fixed incomes, commuters who must travel far  
distances to get to work because they are  
priced out of the cities in which they work, and every  
Californian who will have to bear the brunt of  
increased electrical bills, but most notably, our low-income  
households.  
For these reasons, I respectfully oppose the adoption of the  
Advanced Clean Fleets rule.  
Sincerely,  
Brad Staub

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 15:20:35

No Duplicates.



## **Comment 195 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jatinder

Last Name: Deol

Email Address: Jatdeol05@gmail.com

Affiliation:

Subject: Objection to the new bill being proposed

Comment:

Hi my name is Jatinder Deol I am a owner operator operating out of Stockton California and I would like to take the time to say my reason why I am opposing this bill is due to the fact that this is really pushing the limits for us owner operators this past year has already been very difficult with the outrageous diesel prices and inflation with very little work to compensate the expense and I and many others like me believe that making us switch trucks every 800,000 miles will make it really hard on us owner operators and are family's so in my opinion I oppose this bill and hope that you take my concerns into consideration thank you have a nice day.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 16:01:26

No Duplicates.

## **Comment 196 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Hammad

Last Name: Khan

Email Address: Hammadkhan1811@gmail.com

Affiliation:

Subject: Help us

Comment:

Electric trucks can not be used at this time there's no place we  
can go

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 19:44:32

No Duplicates.

## **Comment 197 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Mohammad

Last Name: Khan

Email Address: Gsrkhan@ucdavis.edu

Affiliation:

Subject: Electric trucks

Comment:

Electric trucks will effect transportation. There is limited charges and they are not safe. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 19:45:00

No Duplicates.

## **Comment 198 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: David

Last Name: Molina

Email Address: molinad4@yahoo.com

Affiliation:

Subject: Electric trucks

Comment:

If California goes to all EV it will effect the supply chain issues even further. California has no effective charging stations to supply these trucks.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 19:45:09

No Duplicates.

## **Comment 199 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Christopher

Last Name: Lish

Email Address: lishchris@yahoo.com

Affiliation:

Subject: Strengthen the Advanced Clean Fleets Rule -- Notice of Public Hearing to Consider Proposed

Comment:

Sunday, October 16, 2022  
Clerks' Office  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814  
Subject: Strengthen the Advanced Clean Fleets Rule -- Notice of Public Hearing to Consider Proposed Advanced Clean Fleets Regulation  
Dear California Air Resources Board Chair Randolph and Members of the Board:  
Thank you for your work in developing the Advanced Clean Fleets ("ACF") thus far. I am writing to urge you to accelerate your proposed 100% sales target from 2040 to 2036. The work that the California Air Resources Board (CARB) is doing to eliminate pollution from California's heavy and medium-duty trucks is admirable, but the climate and air quality crises demand more urgency from CARB than what is currently planned. Californians are feeling the impacts of the climate crisis every day, from extreme heat to rising sea levels to wildfires to droughts. Millions of Californians continue to live in communities that are out of compliance with federal air quality standards. The state must urgently move away from fossil fuels and towards renewable energy and zero emission technologies to help address these critical issues. Diesel trucks are one of the fastest growing sources of greenhouse gas emissions, the largest source of California's nitrogen oxide (NOx) pollution, and the largest source of air pollution disparity in the United States. Trucks make up a small portion of vehicles on the road in California but are the largest producer of our notorious smog problem and pose the most cancer risk connected to pollution from our transportation sector. Burning diesel creates one of the most toxic forms of air pollution for human health, and is linked to premature death, chronic heart and lung disease, asthma, and diminished lung function in children. Without immediate action, the freight industry's rapid growth means pollution burdens will worsen, especially for low-income communities of color. A delayed timeline for 100% electric trucks will only lead to further health and climate impacts. Delivery vehicles have become part of our daily lives. All over the world, they clog up our streets, take up space on our already congested roads and pollute the air we breathe—and the situation is getting worse. The Covid-19 pandemic normalized same-day and next-day deliveries, and the inexorable rise of online shopping means the delivery industry is only likely to grow—the United States is currently the second biggest e-commerce market in the world, and is expected to grow to a staggering US\$1.3 trillion by 2025. This is an environmental justice issue: communities of color and low-income communities are the most likely to be nearby major freight routes and therefore exposed to this pollution. CARB's proposed Advanced Clean Fleets rule would deliver significant

emissions reductions, but the current proposal leaves too many of California's buses and trucks unaccounted for. CARB cannot miss this opportunity to get polluting trucks off the road as soon as possible. The ACF is critical to addressing California's climate and environmental justice crises associated with this boom in e-commerce, and beyond. Strengthening the ACF rule is one of CARB's most critical opportunities to a pathway that meets Governor Newsom's Executive Order, the targets in the Mobile Source Strategy, and our health and climate needs. The rule also sets precedent for the rest of the country—an opportunity that cannot be missed. As CARB Staff's analysis confirms, adopting Alternative 2 is feasible and will lead to critical emission reductions. Therefore, I ask that CARB change the proposed Advance Clean Fleets regulation in line with Alternative 2 in the Initial Statement of Reasons (ISOR). Specifically, CARB should:

- 1) require 100% zero emission truck sales in California by 2036 (instead of 2040, as proposed);
- 2) reduce the size of class 7 and 8 (big rig) fleets covered by this rule from 50 to 10; and
- 3) begin transitioning all trucks to zero emission starting in 2027 (instead of 2030, as proposed).

California is far from attainment in the most polluted air basins in the nation and from meeting the 2030 climate targets. Meanwhile, emissions from freight are rising and new warehouses and logistics centers sprout almost weekly, consuming the land and air around low-income communities of color. Even more dramatic reductions are needed to fulfill CARB's obligations, but anything less than Alternative 2 imperils the chances of doing so. Alternative 2 delivers substantially greater emission reduction benefits at little additional cost. CARB staff's assessment demonstrates that advancing the 100% sales requirement to 2036 and lowering the fleet threshold to 10 or more trucks would greatly speed the delivery of ZE trucks. These components will add earlier and larger reductions in NOx, fine particulates (PM2.5), and greenhouse gases (GHGs), and avoid thousands of additional deaths and hospitalizations. Benefits from Alternative 2 include:

- \* Over 130,000 more ZE trucks in 2050;
- \* 43% to 60% greater reduction tons of NOx and harmful fine particulate emissions;
- \* 40% to 54% greater reduction of greenhouse gas emissions;
- \* \$25 to \$34 billion in additional health benefits; and
- \* 2,500 to 3,000 avoided premature deaths.

The pace of progress in the zero emission truck sector is promising with even more favorable research published as well as new announcements for investment in battery and vehicle manufacturing, charging infrastructure, and large purchase orders. Stronger regulations will speed the maturation of a market that is already growing. Even with the changes we are calling for, the ACF will not guarantee the level of ZE truck deployments necessary to achieve our air and climate targets. But, the stronger alternative will not only bridge the gap to our targets but build the signals and momentum necessary to reach earlier tipping points that unlock greater progress. As you know, the Clean Air Act waiver allows California to adopt stronger standards than those of the federal government and set the precedent for the rest of the country on how to mitigate vehicle emissions. California can achieve and even exceed current commitments, and set the stage for other states to follow suit. The fate of our air quality and the planet depends on this outcome, which CARB has the unique ability to influence. CARB cannot miss this opportunity to combat the climate crisis and deliver clean air to overburdened, frontline communities. Please do right by everyone in California and bring 100% electric trucks to California on the swiftest possible

timeline. Please update the rule to align with Alternative 2. I urge you to use your power to ensure that our streets are for people, not pollution. Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources. Sincerely, Christopher Lish  
San Rafael, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-16 08:01:08

No Duplicates.

**Comment 200 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Glenn

Last Name: Choe

Email Address: glenn.choe@toyota.com

Affiliation: Toyota Motor North America

Subject: Toyota Comments on Adv. Clean Fleets Regulation

Comment:

To CARB

Attached are Toyota's comment related to Adv. Clean Fleets regulation. Thank you.

Sincerely,

Glenn Choe

Toyota Motor North America

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/217-acf2022-AnZTOlQsVmpVJwVk.pdf'

Original File Name: Toyota ACF COMMENT cover and attachment.pdf

Date and Time Comment Was Submitted: 2022-10-16 08:23:19

No Duplicates.



**Comment 201 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Earl

Last Name: Rizzo

Email Address: earl.rizzo@yahoo.com

Affiliation:

Subject: Notice of Public Hearing to Consider Proposed Advanced  
Comment:

I oppose this regulation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-16 08:49:53

No Duplicates.

## **Comment 202 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Donald

Last Name: Wortley

Email Address: dswortley@lodidirt.com

Affiliation:

Subject: Advanced Clean Feets Proposed Regulation

Comment:

For this to be of any value the production of electricity must meet zero emissions or we have gained nothing. The production zero emission must be less than current emissions

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-16 10:37:59

No Duplicates.

## **Comment 203 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kulwinder

Last Name: Nagra

Email Address: knagra35@icloud.com

Affiliation:

Subject: We can't afford

Comment:

This is impossible. I can't afford .

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-16 17:38:50

No Duplicates.

## **Comment 204 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Dave  
Last Name: Johnson  
Email Address: dave.johnson@edstaub.com  
Affiliation:

Subject: Advanced Clean Fleets Regulation  
Comment:

10/16/22

Clerk of the  
Board  
California Air  
Resources Board  
1001 I Street,  
Sacramento, California 95814

RE: Title 13.  
Public Hearing to Consider Proposed Advanced Clean Fleets  
Regulation

I write in strong opposition to the proposed Advanced Clean Fleets rule as I believe it will have significant negative ramifications on the state of California. Mandating the transition to zero emission fleets, at a time when there is limited and an extremely costly supply on the market for heavy duty ZEVs, a lack of comprehensive infrastructure in the state, and we are grappling with an unreliable grid, will only serve to drive up the costs of all goods in the state, and increase the cost of living for many of us who are just trying to survive.

It will also create immense uncertainty surrounding the availability of goods, many of which are critical necessities, if these ZEV heavy duty vehicles cannot travel at a comparable distance to their internal combustion engine counterparts. Breaks or bottlenecks in our supply chains will have extensive consequences on the economy, which could create shortages and further increase the price of goods.

This proposal will be the most damaging to our most vulnerable communities and residents in the state. I am deeply concerned with how the implementation of this regulation, and the corresponding spike in prices for goods and fuel due to the increased costs of operating heavy duty ZEVs, will impact our seniors on fixed incomes, commuters who must travel far distances to get to work because they are priced out of the cities in which they work, and every Californian who will have to bear the brunt of increased electrical bills, but most notably, our low-income households.

For these reasons, I respectfully oppose the adoption of the Advanced Clean Fleets rule.

Sincerely,  
Dave Johnson

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-16 17:44:59

No Duplicates.

## **Comment 205 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Frank

Last Name: H

Email Address: frankh626@gmail.com

Affiliation:

Subject: Advanced Clean Fleets Regulation - Too Early For Adoption

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/222-acf2022-BmUGYVMgBTRQCQlo.pdf'

Original File Name: CARB ACF - Comment.pdf

Date and Time Comment Was Submitted: 2022-10-16 20:52:18

No Duplicates.

## **Comment 206 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: David

Last Name: Gurrola

Email Address: david@onelinktransport.com

Affiliation: One Link Transport Inc.

Subject: Advanced Clean Fleet Rule - Drayage

Comment:

o Whom it may concern:

After researching the infrastructure options available and assuming that the trucking OEM's will continue at the same pace of clean truck development, it would seem that the proposed requirements for drayage trucks beginning 1/1/2024, are impractical and downright unfair.

It is easy to assume, with all due respect, from behind a desk or in an office setting, that truckers are not intelligent enough to understand the effects of climate change or the need to make changes to combat the issue. You would be wrong. We do understand and want to be a part of the solution. I think if you would listen a bit more to the people who these regulations are going to most immediately burden, you would find that we truckers are willing to work with our community leaders and the CARB to do our part, but these hurried requirements seem like a "take it leave it" type solution.... You are in fact telling a segment of the trucking community to "sink or swim". Maybe some will swim, but most will sink. This is a tough enough business without the kind of pressures you are throwing on our plates. Where is the fairness and EQUITY in that for the small trucking fleets? The little guy. Or do we not matter? Are we acceptably expendable? Fact is, we will be collateral damage. And some will say we were a necessary sacrifice for the greater good. I really hope I am wrong on that.

Truly.

Reality is, trucking company owners work their tails off everyday to make sure the country continues to get their shipments moving in and out of these ports. During the pandemic everyone was thanking us for doing our part in keeping the supply chain moving. We stepped up. We did our jobs. We were heroes...Now our trucks are a nuisance and we are the enemy because we are aren't moving at the accelerated pace you set forth. We are not the enemy and given the chance we can continue to be part of the solution. We will adopt new technologies and continue to purchase cleaner and cleaner trucks but this jump you are proposing is more of a giant leap and some simply will not make it.

I want to be clear, these regulations to clean up our environment are important and necessary. It's the right direction to be going in, but can we slow down a bit so we can all keep up and move forward together? It's discouraging that these regulations might put me in a position where I can lose everything I have worked for these last 4 years because of the speed of change.

I'm writing this in the hopes that you listen. I am one of the many who are out here grinding it out at the ports and would love to continue to do so. Please consider putting off these hastily timed regulations. Give the industry more time. Time for

the OEMS not only to have more equipment available but to innovate equipment to the point where we can use it efficiently to run our businesses. Current ranges do not allow that in all cases. More time for the independent maintenance and repair sector to catch up and train the 1000's of mechanics needed to support the industry. More time is needed to build out the infrastructure that is needed. This is one of the biggest most obvious obstacles to this whole changeover. The elephant in the room that nobody involved in pushing this pace wants to recognize. Its a huge concern to everyone and the solution being pushed is unrealistic. Please do not tell me that companies installing and maintaining their own charging points is a practical solution to this issue. It is not, and to say it is, is either naive or is taking a dishonest stance. We just need more time to figure out how to create a situation where everyone has a chance to both contribute and succeed. Slow down and allow us to step up. We always do and always will. Given the chance.

Thank you,  
David J. Gurrola Jr.  
One link Transportation Inc.  
CEO

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-16 23:17:37

No Duplicates.



## **Comment 207 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Christine

Last Name: Wolfe

Email Address: christinew@cceeb.org

Affiliation: CCEEB

Subject: CCEEB Comments on Draft ACF Regulation

Comment:

Please find our comments attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/224-acf2022-VWdXYVxvBWRReQg5.pdf'

Original File Name: 2022.10.16 CCEEB ACF 45-day Package Comments.pdf

Date and Time Comment Was Submitted: 2022-10-16 23:27:10

No Duplicates.

**Comment 208 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Paul

Last Name: Miller

Email Address: pmiller@nescaum.org

Affiliation: NESCAUM

Subject: NESCAUM Comments on Proposed Advanced Clean Fleets Regulations

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/225-acf2022-BWtcPwR2VWVQNwZz.pdf'

Original File Name: nescaum-carb-acf-comments-20221017.pdf

Date and Time Comment Was Submitted: 2022-10-17 06:02:01

No Duplicates.

## **Comment 209 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Chris

Last Name: Busch

Email Address: [chrisb@energyinnovation.org](mailto:chrisb@energyinnovation.org)

Affiliation: Energy Innovation: Policy & Technology

Subject: Energy Innovation supports Advanced Clean Fleets proposal

Comment:

Energy Innovation

Policy and Technology LLC® offers the following summary comments on the proposal:

1.

The Advanced Clean Fleets rule advances the state of the art in policy design and is another instance of California leadership with spillover effects that will spur accelerated global climate action.

2.

We support adoption of the staff proposal, while noting even stronger action is merited, considering the demonstrated climate, public health, and economic benefits.

3.

Learning curve effects mean costs are likely to be lower and economic benefits greater than CARB estimates.

4.

We recommend establishing a regular schedule for future policy updates considering rapidly evolving markets and technology.

We appreciate CARB's consideration of our full set of comments in the attached letter.

Thank you for your work on this policy,

Chris Busch, Ph.D.

Director, Transportation and Senior Economist

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/226-acf2022-B2JXP1I2AyIKa1Qt.pdf>'

Original File Name: Energy Innovation supports Advanced Clean Fleets.pdf

Date and Time Comment Was Submitted: 2022-10-17 07:03:55

No Duplicates.

## **Comment 210 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: William

Last Name: McDonnell

Email Address: wmcdonnell@ieua.org

Affiliation: Inland Empire Utilities Agency (IEUA)

Subject: IEUA Comments on Advanced Clean Fleets Regulation

Comment:

Hello and thank you for the opportunity to comment on ACF2022.  
Please see the attached comment letter regarding ACF2022's impact  
on essential wastewater utility services and recommendations on how  
to mitigate them.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/227-acf2022-WmhQZlRnUjMAKwQ1.pdf'

Original File Name: 2022-10-17 IEUA Comments on Advanced Clean Fleet Regulation.pdf

Date and Time Comment Was Submitted: 2022-10-17 07:19:24

No Duplicates.

## **Comment 211 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Amanda  
Last Name: Parsons DeRosier  
Email Address: Amanda.DeRosier@gceholdings.com  
Affiliation:

Subject: Encouraging Further Renewable Diesel Adoption in CA  
Comment:

Clerk of the  
Board  
California Air  
Resources Board1001 I  
Street  
Sacramento, CA  
95814

October 13,  
2022

Dear Chair  
Randolph and Board Members,

Global Clean  
Energy is a California-based renewable fuels innovator producing ultra-low carbon renewable fuels from patented nonfood camelina varieties. We thank the California Air Resources Board (CARB) for allowing us the opportunity to comment on the Proposed Advanced Clean Fleets (ACF) Regulation for medium- and heavy-duty fleets.

Global Clean  
Energy is committed to advancing climate reduction targets to improve air quality throughout the Golden State using our ultra-low carbon camelina-based renewable fuels. We appreciate CARB taking steps to address transportation-related emissions.

We commend  
CARB's efforts to reduce harmful emissions from motor vehicles through the Proposed ACF Regulation. We are equally supportive of staff's recognition that zero-emission vehicle transition is better suited for smaller fleets. While CARB continues investigating a range of tools that can address medium- and heavy-duty vehicle fleets in an equitable and effective way, we respectfully recommend CARB further incentivize the use of renewable diesel in its push to achieve carbon neutrality through the Proposed ACF Regulation.

Renewable diesel  
is a clean energy technology option that will improve air quality in the near-term but also deliver on longer-term climate goals. As your proposed regulation confirms, the use of low carbon fuels contributes to the reduction of GHG emissions from the

transportation sector: “Given that internal combustion engine (ICE) vehicles from legacy fleets will likely remain on the road for some time, even after all new vehicle sales have transitioned to ZEV technology, low carbon liquid fuels may continue to be used during this period of transition especially for more challenging use cases, and sectors such as aviation, locomotives, and marine applications” (Pg. 109). We encourage CARB’s adoption of ultra-low carbon renewable diesel incentives for medium- and heavy-duty vehicles and other sectors that are harder to decarbonize such as rail, aviation, ocean-going vessels and stationary applications.

#### The Proposed ACF

Regulation provides that mobile transportation sources and the fossil fuels that power them are the largest contributors to the formation of ozone, GHG emissions, PM<sub>2.5</sub>, and toxic diesel PM. Renewable diesel significantly reduces criteria pollution, including NO<sub>x</sub> and PM, as well as reducing GHG emissions by up to 85% (depending on feedstock — camelina feedstock fuels reduce GHG emissions by over 90%). In fact, according to CARB’s Renewable Diesel Workshop<sup>1</sup>, using renewable diesel on all tier 0-4i equipment in the San Joaquin Valley (2025) would reduce NO<sub>x</sub> emissions by 0.55 tpd and PM<sub>2.5</sub> emissions by 0.073 tpd. Renewable Diesel has fewer GHG and local emissions than both traditional diesel and biodiesel fuels, acts as a drop-in replacement for modern traditional diesel engines with no blending required, and unlike ZEVs, does not require largescale infrastructure replacement. In addition, renewable diesel is readily available across the majority of California and is at cost parity with CARB ULSD.

Further, the heightened use of renewable fuels alleviates public concerns around the availability and rollout of public and private ZEV infrastructure, including both charging and hydrogen stations, and the grid’s ability to meet the steadily growing electrical demand generated by the Proposed ACF Regulation and other rules promoting electrification. Renewable diesel is also a valuable tool to cost-effectively complete the transition for remaining fleets that are more dependent on purchasing trucks on the secondary market.

We encourage you to prioritize the use of renewable diesel more readily in California. There are no technical, supply, or financial reasons why medium and heavy-duty vehicles cannot switch to renewable diesel use rather than ZEVs to support CARB’s carbon reduction objectives. By encouraging renewable fuels’ heightened use in medium and heavy-duty vehicles, CARB can limit economic impacts on businesses that would otherwise have to replace their existing vehicle fleets while achieving its environmental objectives of reducing emissions.

Global Clean Energy’s primary renewable fuel feedstock, our patented camelina, is a lipid-based feedstock that is nonfood, grows between traditional crop cycles on dryland farms, and does not contribute to land use change. Indeed, our patented camelina varieties were issued a first-of-its kind LCFS pathway by CARB in 2015. Further, camelina has the potential to be the lowest carbon renewable fuel feedstock on the market. Camelina-based renewable fuels produced by Global Clean Energy have an ultra-low carbon intensity (CI) score that has the potential to

go below zero.

With more than 100 employees, our Bakersfield Renewable Fuels Refinery is already actively contributing to the "Just Transition" from fossil fuels to clean energy careers. Once our Bakersfield Renewable Fuels Refinery (nameplate capacity of 15,000 barrels per day) commences operation in the coming months, we expect initial production of approximately 150 million gallons per year. Our renewable fuels will be readily available to the California market through existing distribution agreements, and we expect the San Joaquin Valley's agricultural and trucking sectors to consume much of what we produce. Moreover, we expect our renewable fuels to have a direct and beneficial impact on an area of the Golden State that the Proposed ACF Regulation notes has the among the most critical air quality challenges in the state. Our fuels can play a meaningful role in the clean air solution for this region and other regions throughout California.

We appreciate CARB taking the benefits of renewable fuels into account in its rule making process and encourage you to consider incentivizing the use of ultra-low carbon renewable diesel fuels in medium- and heavy-duty vehicles as well as other sectors such as rail, aviation, and ocean-going vessels to advance California's clean energy goals.

Sincerely,

Amanda Parsons  
DeRosier  
Vice President of  
Public Affairs and Investor Relations  
Global Clean  
Energy | [www.GCEholdings.com](http://www.GCEholdings.com)  
562-233-5146 |  
[Amanda.DeRosier@gceholdings.com](mailto:Amanda.DeRosier@gceholdings.com)

[https://ww2.arb.ca.gov/sites/default/files/2021-09/ORD\\_Amendment\\_Workgroup-Renewable\\_Diesel.pdf](https://ww2.arb.ca.gov/sites/default/files/2021-09/ORD_Amendment_Workgroup-Renewable_Diesel.pdf)

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/228-acf2022-BmUCZV0uUWAGXwBz.pdf>'

Original File Name: CARB SCOPING LETTER GCE Final.pdf

Date and Time Comment Was Submitted: 2022-10-17 08:08:08

No Duplicates.

## **Comment 212 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Tom  
Last Name: Van Heeke  
Email Address: tvanheeke@rivian.com  
Affiliation: Rivian Automotive, LLC

Subject: Rivian Automotive, LLC, Comments on the Proposed Advanced Clean Fleets Regulation

Comment:

Rivian is pleased to submit the attached comments in general support of the proposed Advanced Clean Fleets regulation. We also recommend specific actions to strengthen the proposed regulation further.

Rivian thanks CARB for its continued leadership, as well as the staff for their efforts in developing this important proposal. We look forward to the Board's consideration of this item. Sincerely,  
Tom Van Heeke  
Sr. Policy Advisor

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/229-acf2022-B3VSPVMkBz0BZgZo.pdf'

Original File Name: Rivian\_ACFComments\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-10-17 08:04:49

No Duplicates.



## **Comment 213 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Gail  
Last Name: Parson  
Email Address: gparson@e2.org  
Affiliation: E2 (Environmental Entrepreneurs)

Subject: Business Community Support for a More Ambitious Advanced Clean Fleets Rule  
Comment:

Dear Chair Randolph and California Air Resources  
Board Members,  
Please find attached, E2's comment letter on behalf  
of our business members and supporters for adopting a more  
ambitious Advanced Clean Fleets (ACF) rule that zeros out fossil  
fuel medium- and heavy-duty (MHD) vehicle sales in 2036 and aligns  
with Governor Newsom's Executive Order N-79-20. An improved ACF rule is  
essential to meeting our state's air quality and greenhouse  
gas reduction targets while advancing our clean energy  
economy.  
For any questions or additional information, please  
contact me at gparson@e2.org.  
Thank you,  
Gail Parson  
E2 Deputy Director

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/230-acf2022-UzZRZVYIVmRVMFM1.pdf>'

Original File Name: E2 ACF Comment Letter 101722.pdf

Date and Time Comment Was Submitted: 2022-10-17 08:20:37

No Duplicates.

## **Comment 214 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Andy

Last Name: Byerly

Email Address: andy.byerly@allisontransmission.com

Affiliation: Allison Transmission

Subject: Advanced Clean Fleet Regulations

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/231-acf2022-AGNXPIU5AjxSMQVr.pdf'

Original File Name: Comments for ACF Regulation from Allison Transmission.pdf

Date and Time Comment Was Submitted: 2022-10-17 08:28:47

No Duplicates.

**Comment 215 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jerry

Last Name: Davis

Email Address: jdavis@amberresources.com

Affiliation:

Subject: OPPOSE CARB's PROPOSED ADVANCED CLEAN FLEETS REGULATION

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/232-acf2022-B2RXMAFyWGkDWgFk.docx'

Original File Name: Carb Engine Family Info Sheet.docx

Date and Time Comment Was Submitted: 2022-10-17 09:06:32

No Duplicates.

**Comment 216 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Lucille

Last Name: Cadic

Email Address: lucille.cadic@airliquide.com

Affiliation: Air Liquide Advanced Technologies U.S. L

Subject: Advance Clean Fleets comments

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/233-acf2022-UWNQZIJhAmMDKFBh.pdf'

Original File Name: 2022-10-17 Comment letter on Advanced Clean Fleets.pdf

Date and Time Comment Was Submitted: 2022-10-17 09:05:15

No Duplicates.

## **Comment 217 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Christina

Last Name: Hartz

Email Address: chartz@cganet.com

Affiliation: Compressed Gas Association

Subject: CGA Response to Notice of Public Hearing to Consider Proposed Adv. Clean Fleets Regulation

Comment:

To the Clerk of the Board, California Air Resources Board:  
On behalf of Rich Craig, CGA Vice President, Technical and Regulatory Affairs, please see the attached letter from the Compressed Gas Association in response to California's High Priority and Federal Fleet Requirements included in the Advanced Clean Fleets (ACF) proposed draft regulations.

Respectfully,

Christina Hartz

Committee Administrator, Compressed Gas Association

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/234-acf2022-WzhQMVc3UV1XIwJn.pdf>'

Original File Name: CGA Response to CARB.pdf

Date and Time Comment Was Submitted: 2022-10-17 09:06:09

No Duplicates.

## **Comment 218 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Dana

Last Name: Hamilton

Email Address: dana.hamilton@advancebeverage.com

Affiliation: Advance Beverage Company

Subject: Advanced Clean Fleet Regulation bias Against Non-Transportation Sectors

Comment:

Thank you for considering our feedback on the proposed Advance Clean Fleet Regulation. We hope our comment's contents will resonate and be carefully considered. We contend that the proposed rule's inclusion of the \$50m gross revenue threshold is biased against non-transportation sector businesses. It will require local businesses who have fleets smaller than fifty tractors to comply with the ruling if their businesses bundle revenue from multiple service sectors. For instance, our local, family-owned beverage distribution business is being paid by our customers to manage their beverage inventory levels; to move/organize products into the storage and retail areas of their facilities; to merchandise their retail shelves/displays; to clean their draught lines; to create/install signage at their facilities; and to use our tractor/trailers to deliver the beverages to their retail establishments. We are not solely a transportation company.

Please ask yourself this simple question. In our case, how is the \$92.2m of gross revenue that we generate across multiple service sectors tied to how much pollution our delivery tractors emit? The answer is simple: "There is no correlation." The size of our fleet, thirty-four tractors, is certainly a direct measure. We contend that the simplistic approach of the gross revenue aspect of the proposed ruling is biased against local, service-sector businesses who only use medium/heavy duty diesel tractors for a minor portion of their revenue generation. Total company, we have 150 employees, and we have thirty-four tractors, each driven for one-shift, five days per week. Our thirty-four drivers are only 22.7% of our workforce while 77.3% of our employees perform non-transportation-related services to our customers. The Advanced Clean Fleet Regulation is meant to put zero-emission tractors on the road running in high-use scenarios. Our tractors sit more than they drive, and we're getting paid by our customers to do a lot more than to deliver beverages. With less than fifty tractors, driving low, local miles, we should be allowed to remain exempt regardless of our aggregated service-sector gross revenue. The simplistic use of a \$50m gross revenue threshold is unfair to businesses that operate in multiple services sectors. Please consider removing the gross revenue aspect of the ruling or adjusting it to not penalize multi-service sector, non-transportation businesses! Thank you, again, for your time and consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 09:10:32

No Duplicates.

## **Comment 219 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: James

Last Name: Gonzalez

Email Address: jmg-1@live.com

Affiliation: Independent Construction Co.

Subject: Pause this proposed regulation now.

Comment:

Please see attached response to proposed regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/236-acf2022-VTRUNIEmUC1WM1c7.docx'

Original File Name: Adv.CleanFleetsResponse.2.docx

Date and Time Comment Was Submitted: 2022-10-17 09:37:24

No Duplicates.



## Comment 220 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.

First Name: Trevor  
Last Name: Gasper  
Email Address: tgasper@thorindustries.com  
Affiliation: THOR Industries, Inc.

Subject: THOR Industries' Written Comments on Proposed Advanced Clean Fleet Regulation  
Comment:

Liane M. Randolph,  
Chair  
California Air Resources  
Board  
1001 I Street

Sacramento, CA  
95814

Re:

THOR Industries' Written Comments on Proposed Advanced  
Clean Fleet Regulation

Dear Chair Randolph:

I am initiating this correspondence to you in my capacity as Senior Vice President and General Counsel for THOR Industries, Inc. ("THOR"). THOR is the world's largest manufacturer of recreational vehicles including motorhomes, travel trailers and fifth-wheel trailers.

This letter is intended to serve as THOR's written comments on the California Air Resources Board's ("CARB") proposed Advanced Clean Fleets ("ACF") regulations. For the reasons set forth below, THOR is requesting that CARB amend the ACF to exempt motorhomes from its requirements.

1. ACF's Zero Emission Requirements Impose an Undue Burden on the Motorhome Industry.

Section 2016(d) of the proposed ACF requires vehicles over 8500 lbs. GVWR (which includes motorhomes) and offered for sale in California to be ZEVs beginning with the 2040 model year. If enacted, this requirement will have a substantial negative impact on the motorhome industry in the State of California.

Unlike automobiles, there are no zero emission motorhomes currently being sold to consumers. While zero emission motorhome concept vehicles exist, it is unlikely that these concept vehicles will be manufactured for sale to consumers in the foreseeable future. This is due, in part, to the unique batteries and motors that are required to power motorhomes.

Switching to batteries and motors that produce

zero emissions will significantly increase the cost of motorhomes. It is currently estimated that zero emission motorhomes will cost approximately \$50,000 - \$100,000 more per unit than existing gas or diesel powered motorhomes. A cost increase of this magnitude will render ZEV motorhomes unaffordable for many potential owners who will be forced pursue other recreational activities to the detriment of California's motorhome dealers, service providers (e.g. campgrounds, parks, etc.) and other businesses that rely on the motorhome industry. These negative economic impacts on the motorhome industry can be avoided by simply amending the ACF to exempt motorhomes from its requirements.

## 2. The ACF Fleet Milestone Requirement Excludes Motorhomes.

The ACF establishes new regulations for owners of motorhome rental fleets in California that include fifty (50) or more motorhomes at any point of time in the course of a year. Beginning in 2024 and 2025 owners of such motorhome rental fleets will be required to comply with either the "ZEV addition" requirements in S.2015.1 or the "ZEV fleet milestone" requirements in S.2015.2.

To comply with the "ZEV addition" requirements, owners of motorhome rental fleets are required when adding to their existing fleet to purchase ZEV motorhomes unless a ZEV unavailability exemption can be utilized. To comply with the "ZEV fleet milestone" requirements, owners of motorhome rental fleets are required to meet or exceed the ZEV milestone percentage requirements set forth in Table A: ZEV Fleet Milestones by Milestone Group and Year, as listed in Appendix A-2.

Table A provides "ZEV fleet milestone" for three (3) groups (Milestone Group 1, Milestone Group 2 and Milestone Group 3). Each of the three (3) groups are defined in the ACF; however, such definitions fail to reference motorhomes. As such, it appears that owners of motorhome rental fleets are not eligible to comply with the "ZEV fleet milestone" requirements and, instead, are required to comply solely with the "ZEV addition" requirements. If this interpretation is correct, owners of motorhome rental fleets will be required to begin purchasing ZEV motorhomes (or utilizing ZEV unavailability exemptions) in 2024 rather than 2040. Such a result is nonsensical given the fact that no zero emission motorhomes are currently being sold to consumers. Again, these negative impacts can be avoided by amending the ACF to exempt motorhomes from its requirements. THOR appreciates the opportunity to comment on the proposed ACF.

If you have any questions or would like to discuss THOR's written comments, please feel free to contact me. My contact information is set forth below.  
Sincerely,

Thor Industries, Inc.

By: Trevor Gasper, Sr. Vice  
President , General Counsel & Corporate Secretary  
Telephone:  
(574) 970-7925

E-Mail: tgasper@thorindustries.com

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 09:49:03

No Duplicates.

## **Comment 221 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Doug

Last Name: Allen

Email Address: waverider314@gmail.com

Affiliation:

Subject: Advance Clean Fleets Reg

Comment:

<https://americanmind.org/features/saving-the-environment-from-environmentalists/bad-carbs/>

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 09:59:43

No Duplicates.

## **Comment 222 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Nicole

Last Name: Collazo

Email Address: nicole@vcapcd.org

Affiliation: VCAPCD

Subject: Comment on Draft EA for Advanced Clean Fleets Regulation

Comment:

Thank you for the opportunity to provide comments to the draft EA. VCAPCD submits the following comment.

The draft EA does not contain an analysis or quantification on the reactive organic compounds (ROC) emissions as a result of the project. The Air Quality section includes an analysis on the PM<sub>2.5</sub> and nitrous oxides (NO<sub>x</sub>) but is missing analysis on ROC emissions, as can also be seen in Figure 4 and Figure 5. As a comparison, the draft EA for the 2022 Scoping Plan Update includes a NO<sub>x</sub> and ROC emissions analysis that can be summarized in Table 4-3 of the draft document. The only reference to ROC in the EA for the Advanced Clean Fleet Regulation is found in Page 38 (missing its acronym but spelled out).

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 09:54:52

No Duplicates.

## **Comment 223 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Daniel

Last Name: Hamilton

Email Address: dhamilton2@oaklandca.gov

Affiliation: City of Oakland

Subject: City of Oakland comments on proposed ACF2022 Regulation

Comment:

Thank you for the opportunity to comment on the proposed regulations. CARB's plans for gradual ZEV deployment are enthusiastically supported, however overall statewide plans to deploy ZEV's for the stated goal of reducing tailpipe emissions must also allow cities the flexibility to focus on market ready and available technologies and financing strategies, including incorporating deployment of existing low-carbon and renewable fuels such as Renewable Diesel and Renewable Natural Gas. These renewable fuels can provide similar "right now" emissions benefits while the ZEV plans are executed and are critical to the success of achieving these goals. Examples of this successfully being deployed are found in the Innovative Transit Rule which currently requires large transit fleets with diesel busses to operate them on Renewable Diesel. Mandating statewide use of Renewable Diesel allow immediate carbon footprint reductions and actually achieve ARB GHG reduction goals earlier than relying solely upon ZEV strategies for compliance.

Infrastructure

upgrades costs to enable large scale ZEV deployments are extremely high for fleets which typically operate in a depot model, consolidating vehicle domiciling in a small area. This will require a significant investment increasing the electrical power feeding these locations, which typically will require trenching and/or additional power feeds. These modifications are most cost-effective and successful when performed as a single project which requires identifying and scoping total power requirements for 100% fleet electrification (allowing for exemptions) and performing the upgrade may be necessary prior to the arrival of the ZEV equipment. Integrating these factors into the rulemaking will improve outcomes and improve the implementation pathway for fleet owners.

Funding to support

the incremental vehicle acquisition costs and charging infrastructure installation costs must be provided to COVID-19 cash-strapped fleet operations. Competitive grants and complex application mechanisms disadvantage smaller fleet operations and will likely create inequities penalizing fleets that actually need the funding the most. The mandated ZEV acquisition costs are significantly higher than current inventory petroleum fueled equipment so any proposed acceleration of existing replacement schedules requires funding not just for the incremental costs, but for the total acquisition costs of any additional quantities of vehicles now identified for replacement beyond the fleet's existing replacement schedule. Additionally, the incremental costs

identified by CARB staff in ACF materials significantly underestimates costs that the City of Oakland is seeing in the market. In fact, CARB's own acquisition data for Medium/HD vehicles found on the ARB HVIP funding website are significantly higher than data for the same vehicles found in the ARB ACF documentation.

The timeline for implementation is not realistic and encourages a piecemeal approach to installing required EV charging infrastructure due to the tight timelines. This is neither realistic nor cost effective. It is relatively straight forward to add charging capability up to existing facility electrical available, but the next step beyond this is typically a large-scale increase to power to the facility. Additionally, multiple fleet customers all building out EV charging infrastructure to maximum on the same circuit may be expected to identify and trigger issues at any weak spots in the existing grid that may not necessarily be an issue at existing demand. This may also be expected to increase cost and extend compliance timelines. These costs and timelines are largely facility specific, however installing a typical additional power drop to a facility by PG&E prior to ACF took about 18-24 months. Since every fleet in the state will now be asking for similar improvements/upgrades, the actual adjusted timeline needs to be identified and accommodated for in the implantation plan. Furthermore, due to the large numbers of fleet customers requiring significantly larger amounts of electricity, it can be expected that some locations will actually require a more involved solution such as a sub-station or other larger scale grid project to support the multiplied customer demand. Accommodations to the implementation plan need to be made to allow for these activities which may require CEQA or other time-consuming approvals. Most recently, a transformer shortage is contributing to upgrade timeline delays and cancellations as existing transformers are held in inventory for replacement of existing transformers that fail in service or otherwise become unserviceable.

#### Factoring Total

Cost of Ownership over the life of an EV into acquisition funding discussions fails to acknowledge the distinct differences between capital acquisition funding sources and use restrictions and Operations and Maintenance (O&M) funding sources and use restrictions. This methodology may be appropriate for light duty sedans and high mileage/use transit applications, but the practical implications for medium and heavy duty fleets do not hold true in current market conditions. Even in the more mature light duty vehicle market, the existing TCO models for EV's don't show cost parity or potential costs savings until the last 10% of vehicle life or later. It is unrealistic to anticipate fleets to fund significantly increased capital acquisition costs, through anticipated savings in O&M that are projected 10 or 15 years in the future. It is also unclear if the higher rates for electricity in California were included in the TCO analyses relied upon by ARB to identify these potential ZEV TCO savings.

#### Facility

electrification goals and mandates must also be factored into these regulations. While electrification to accommodate light and medium/heavy duty fleets, many jurisdictions like Oakland are also endeavoring to eliminate natural gas service to facilities in favor of electricity. These additional demands may be expected to

increase costs of electrical upgrades and place further demands and stress on the existing grid. These facility electrification projects are also taking place at numerous locations in addition to the fleet depot facilities which needs to be identified and planned for in power increase/grid improvement plans.

The City of Oakland supports aggressive action on expanding zero emission vehicles and infrastructure, but needs regulations and incentives that work with the competing and challenging efforts to electrify buildings and transportation systems simultaneously. With supply chain shortages and first cost capital concerns dominating procurement decisions, we recommend modifications to the draft regulations to ensure full compliance and progress towards the State's clean energy and air quality goals.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 09:48:41

No Duplicates.



## **Comment 224 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Michael

Last Name: Ochs

Email Address: mochs@rvia.org

Affiliation: RV Industry Association

Subject: RV Industry Association Comments on Advanced Clean Fleet Regulations

Comment:

Attached please find the comments of the RV Industry Association on CARB's Proposed Advanced Clean Fleet Regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/242-acf2022-UiABcQFpBTcAWQJh.pdf'

Original File Name: RVIA comment on CARB Advanced Fleet Regulation 101722.pdf

Date and Time Comment Was Submitted: 2022-10-17 10:19:30

No Duplicates.

## **Comment 225 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Pamela

Last Name: De Leo

Email Address: pam@deleowelding.com

Affiliation: Doug De Leo Welding, Inc.

Subject: Clean Fleets

Comment:

While everyone understands we need to take steps to reduce as much pollution as we can, realistically until we can get gross polluters like China and other countries to get on board, we are still in trouble, after all we share the same air! Mr. Newsome seems to think that everyone in California is as rich as he is, we are already being taxed to death, and fuel prices are out of control and everything is so expensive. Small business is what built this country, and California makes it almost impossible to stay in business anymore. Now you want us to go out and buy new trucks, that you can't even find. The demand is so high now, that the truck industry is raising the prices so high it is insane. How many small businesses do you think can afford to go out and spend 80K on a truck, and that's just a cab and chassis then we have to put a bed on it. We aren't talking big diesel trucks here, we are talking about work trucks need to service our customers. We try very hard to keep our doors open and our employees working, my husband and I have been in business since 1990. Every year it is getting harder to make a living not only for ourselves but for our employees who rely on us for their paycheck.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 10:20:43

No Duplicates.

## **Comment 226 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jennifer  
Last Name: Capitolo  
Email Address: jcapitolo@calwaterassn.com  
Affiliation: California Water Association

Subject: Comments on Draft Regulatory Language for the Advanced Clean Fleets Regulation  
Comment:

Please find  
attached comments of the California Water Association on Draft  
Regulatory Language for the Advanced Clean Fleets Regulation Public  
Fleet Requirements

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/244-acf2022-AmFdLAdnVVIWM1I9.pdf'

Original File Name: CWA Comments\_CARB Clean Fleets Regulation\_Final 10.17.22.pdf

Date and Time Comment Was Submitted: 2022-10-17 10:44:51

No Duplicates.

## **Comment 227 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Gary  
Last Name: Arant  
Email Address: garant@vcmwld.org  
Affiliation: General Manager, Valley Center MWD

Subject: Advanced Clean Fleets Regulation  
Comment:

October 17, 2022

To:  
California Air Resources Board  
From: Gary Arant, General Manager, Valley  
Center Municipal Water District  
Subject: All Clean Fleets Rule &ndash; Providing Support for  
ACWA&rsquo;s Letter of Comment of

October  
17, 2022 As Well As Additional Comments  
Dear CARB Commissioners and Staff,

As a retail  
water agency and public fleet operator, Valley Center Municipal  
Water District strongly supports the Association of Water Agencies  
letter of comments, dated October 17, 2022. We would also  
like to add the following additional comments:

Commercial  
Availability

As you  
are aware, among retail water agencies, there have been ongoing  
discussions regarding critical aspects of a successful  
implementation of this important regulation. In addition to  
concerns about a very short time frame for implementation,  
including the timely installation of required on-site charging  
infrastructure issue, as well as overall grid reliability, much attention has  
been  
focused on the topic of &ldquo;Commercial Availability&rdquo; of  
suitable Vocational EVs (vehicles water and wastewater utilities  
will use) and how that will be defined in the final  
regulation.

In our  
view, there are many important aspects to the term  
&ldquo;Commercial Availability&rdquo; which are addressed in the  
latest ACWA comment letter, including;  
Available, but in What  
Quantities?

1.  
Vocational EVs may be  
commercially available but are they available in sufficient  
quantities to create a competitive bidding environment for public  
agencies?

Not only should CARB monitor what EVs  
meeting utility performance standards are commercially available,  
but also in what quantities are the EVs available to meet the needs  
of literally over a thousand water, wastewater, county and  
municipal and public electric utilities to provide a competitive

bidding market.

Available but at What  
Price?

2. In light of regulatory  
pressure placed on water, wastewater utilities, public power  
agencies and municipalities to maintain affordable water,  
wastewater and utility services, especially to disadvantaged and  
underserved communities, how much more should a public  
water/wastewater/ county, municipality or public electric utility  
be required to pay for an EV compared to comparable  
ICV&hellip;.30%, 50%, 75%, 100%?

CARB ACF regulations need to establish a cost premium cap  
of 33% beyond which the utility has the option to purchase an  
ICV.

Available, but in what kind of  
Market?

3.  
Without items 1 and 2  
above, the ACF Regulation is creating a market that requires  
utilities to purchase Vocational EVs without determining if  
sufficient quantities exist to create a competitive market and at  
what cost premium cap.

As such, a  
distorted market may emerge where conditions are ripe for unfair  
pricing of EV&rsquo;s.

Without  
mechanisms in place to determine when sufficient numbers of a  
particular EV are available to create a competitive bid market,  
absent a cost premium cap CARB will need to monitor and regulate  
the marketing and sales practices of EV manufacturers and  
retailers.

Available, but  
When?

4.  
Another important  
component of Commercial Availability is, when can the EV be  
delivered? 3 to 6  
months is reasonable and customary, but not 1 to 2-year estimates of which we  
are

aware. The ability of  
a utility to function and respond in normal and emergency periods  
is necessarily tied to the possession of specialized equipment  
meeting the utility&rsquo;s specialized needs.  
CARB needs to set a parameter for EV availability with a  
delivery timeline not to exceed 6 months and if the quoted delivery  
time exceeds 6 months, the utility should have the option to reject  
the bid and purchase a comparable ICV.

Delay Implementation At Least Until January 1, 2025 and  
January 1, 2028 Respectively

With the:

- &bull;Current vagaries about &ldquo;Commercial  
Availability&rdquo; of EV&rsquo;s meeting water and wastewater  
utility critical vocational standards and needs,
- &bull;Questions about the lead time needed to securing  
affordable installation of on-sight charging infrastructure,  
questions about the ability of the IOU&rsquo;s to supply the local  
power needs,
- &bull;Concerns about the overall capability of the  
electrical grid to handle the new demands, and
- &bull;Potential delay of the final regulation until early  
2023&hellip;

it would seem prudent to delay  
implementation of the ACF for at least one-year, until January,  
2025 for 50% of vehicle purchases and January. 2028 for 100% of  
purchases.

&ldquo;Policymakers and  
regulators trying to force aspirational  
policies on  
reality-based, physically constrained systems must be  
honest  
with their constituents  
about the limits of their ambitions, the timeline to

achieve their policy  
goals and the likely cost to consumers to achieve  
these policy ambitions.

It may be an uncomfortable truth, but there  
is a cost to the  
transformation, there are resource limits  
that impact the ability  
to meet arbitrary timelines&hellip;&rdquo;

&ldquo;FERC, State  
Utility Regulators, and the Arsonists  
Dilemma&rdquo;  
Utility Dive, October 4,  
2022

In

Conclusion

Again, with our added  
commentary above, Valley Center Municipal Water District strongly  
supports the October 17, 2022 ACWA letter of comment.

Thank you for your  
thoughtful consideration.

Gary T. Arant  
General Manager

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 10:46:36

No Duplicates.

## **Comment 228 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Davon  
Last Name: Collins  
Email Address: [davon.m.collins@usps.gov](mailto:davon.m.collins@usps.gov)  
Affiliation: U.S. Postal Service

Subject: U.S. Postal Service - Advanced Clean Fleets Comment  
Comment:

Dear Clerk of the Board:  
Please find attached the U.S. Postal Service's comment on the  
proposed Advanced Clean Fleets rule.  
Respectfully submitted,  
Davon Collins  
Environmental Counsel  
U.S. Postal Service

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/246-acf2022-UCUHclEgVnYFXFU2.pdf>'

Original File Name: USPS Comment on CARB Advanced Clean Fleets Rule (10-17-22).pdf

Date and Time Comment Was Submitted: 2022-10-17 10:13:09

No Duplicates.

## **Comment 229 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Melodee

Last Name: Black

Email Address: melodee.black@sce.com

Affiliation:

Subject: SCE Support for ACF Rule with Modifications

Comment:

Southern California Edison (SCE) supports the ACF Rule and requests a few modifications to further clarify requirements and address implementation challenges. SCE appreciates the opportunity to offer its comments and recommendations.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/247-acf2022-BXZWM1YyBwsHYAhr.pdf'

Original File Name: SCE ACF Comments.10.17.22.pdf

Date and Time Comment Was Submitted: 2022-10-17 11:06:41

No Duplicates.



## **Comment 230 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Rebecca

Last Name: Schenker

Email Address: rebecca.schenker@gladstein.org

Affiliation: Gladstein, Neandross & Associates

Subject: GNA Comments on the Advanced Clean Fleets Regulation

Comment:

Attached, please find GNA's comments on the proposed Advanced Clean Fleets Regulation. We appreciate your time and consideration.  
Please don't hesitate to contact us with any questions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/248-acf2022-BWJVPVw8VloDZgFu.pdf'

Original File Name: GNA Comment Letter on ACF Oct 2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 10:55:04

No Duplicates.

## **Comment 231 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: William

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association

Subject: Lung Association call for strengthening ACF proposal

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/249-acf2022-VztUJwZpVGALUIQ1.pdf'

Original File Name: Lung Assn Call for Stronger ACF Rule 10.17.22.pdf

Date and Time Comment Was Submitted: 2022-10-17 11:21:49

No Duplicates.

## **Comment 232 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Cindy  
Last Name: Muller  
Email Address: cmuller@sawyerpetroleum.com  
Affiliation:

Subject: Clean Fleet Regulation  
Comment:

10/17/2022

Clerk of the  
Board  
California Air  
Resources Board  
1001 I Street,  
Sacramento, California 95814

RE: Title 13.  
Public Hearing to Consider Proposed Advanced Clean Fleets  
Regulation

I write in strong opposition to the proposed Advanced Clean Fleets rule as I believe it will have significant negative ramifications on the state of California. Mandating the transition to zero emission fleets, at a time when there is limited and an extremely costly supply on the market for heavy duty ZEVs, a lack of comprehensive infrastructure in the state, and we are grappling with an unreliable grid, will only serve to drive up the costs of all goods in the state, and increase the cost of living for many of us who are just trying to survive.

It will also create immense uncertainty surrounding the availability of goods, many of which are critical necessities, if these ZEV heavy duty vehicles cannot travel at a comparable distance to their internal combustion engine counterparts. Breaks or bottlenecks in our supply chains will have extensive consequences on the economy, which could create shortages and further increase the price of goods.

This proposal will be the most damaging to our most vulnerable communities and residents in the state. I am deeply concerned with how the implementation of this regulation, and the corresponding spike in prices for goods and fuel due to the increased costs of operating heavy duty ZEVs, will impact our seniors on fixed incomes, commuters who must travel far distances to get to work because they are priced out of the cities in which they work, and every Californian who will have to bear the brunt of increased electrical bills, but most notably, our low-income households.

For these reasons, I respectfully oppose the adoption of the Advanced Clean Fleets rule.

Sincerely,  
Cynthia Muller

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 11:46:20

No Duplicates.

## **Comment 233 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Nicole  
Last Name: Looney  
Email Address: nicole.looney@smud.org  
Affiliation: SMUD

Subject: SMUD Comments Re Public Hearing to Consider Proposed ACF Regulation  
Comment:

Sacramento  
Municipal Utility District's Comments on the Public Hearing  
to Consider Proposed Advanced Clean Fleets Regulation - State and  
Local Government Agency Fleet  
Requirements

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/255-acf2022-B3QHbAdzU2QKUwBj.pdf'

Original File Name: SMUD Comments 45-Day ACF Regulation 10.17.22\_LEG 2022-0147.pdf

Date and Time Comment Was Submitted: 2022-10-17 12:00:18

No Duplicates.

## **Comment 234 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Alex  
Last Name: Boesenberg  
Email Address: aboesenberg@mema.org  
Affiliation: MEMA

Subject: MEMA comments on CARB ACF Proposal  
Comment:

On behalf of the Motor & Equipment Manufacturers Association  
the attached comments are respectfully submitted.  
Best Regards,  
Alex Boesenberg  
Vice President of Regulatory Affairs, MEMA

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/256-acf2022-Uz5UNwZqVGYHXlc0.pdf'

Original File Name: MEMA Comments to CARB ACF Proposed Regulations 17Oct2022  
v6\_2.pdf

Date and Time Comment Was Submitted: 2022-10-17 12:16:23

No Duplicates.

## **Comment 235 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Nicholas

Last Name: Blair

Email Address: nickb@acwa.com

Affiliation: ACWA

Subject: CARB Draft ACF Regulation

Comment:

Attached are ACWA's comments in response to the Draft ACF Public  
Fleets Provisions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/257-acf2022-  
B2FQP1c4WWtXPQFe.pdf'

Original File Name: Final\_ACWA Clean Fleets Letter 101722\_\_.pdf

Date and Time Comment Was Submitted: 2022-10-17 12:33:15

No Duplicates.

## **Comment 236 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Madison

Last Name: Vander Klay

Email Address: mvanderklay@svlg.org

Affiliation: Silicon Valley Leadership Group

Subject: SVLG Comments on Proposed Advanced Clean Fleets Regulations

Comment:

Please see the attached for Silicon Valley Leadership Group's comments on the Proposed Advanced Clean Fleet regulations. Thank you for the opportunity to comment on this proposal.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/258-acf2022-AWcWM1MxUFxKaM0d.pdf'

Original File Name: SVLG comments for ACF August 10.17.22.pdf

Date and Time Comment Was Submitted: 2022-10-17 12:46:26

No Duplicates.



## **Comment 237 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Janus

Last Name: Norman

Email Address: jnorman@calcable.org

Affiliation: CA Cable and Telecommunications Assoc

Subject: CCTA comments on Proposed Advanced Clean Fleets Regulation

Comment:

Please see that attached file of CCTA's comments to the proposed regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/259-acf2022-WjlRNAF0VWcDWgRn.pdf'

Original File Name: CCTA Comments on Advanced Clean Fleet Regulation.pdf

Date and Time Comment Was Submitted: 2022-10-17 12:53:49

No Duplicates.

## **Comment 238 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jessica

Last Name: Palmer

Email Address: jessica.n.palmer8.civ@us.navy.mil

Affiliation: Navy Region Southwest / DoD

Subject: DoD Comments on Proposed Advanced Clean Fleets Regulation

Comment:

Good Afternoon,

On behalf of the military Services in California, please find consolidated Department of Defense (DoD) comments on the California Air Resources Board's (CARB) proposed Advanced Clean Fleets Regulation, attached. We appreciate the opportunity to comment and look forward to continuing to partner with CARB as the regulation is finalized.

Sincerely,

Jessica Palmer

DoD REC 9 Governmental Affairs

Navy Region Southwest

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/260-acf2022-BWFUPVYzAAwGYwRr.docx'

Original File Name: DoD Comment Matrix\_ACF.docx

Date and Time Comment Was Submitted: 2022-10-17 12:24:49

No Duplicates.

## **Comment 239 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Industry Air Quality Coalition

Subject: Advanced Clean Fleets Regulation

Comment:

This attached comment letter was submitted on behalf of the Construction Industry Air Quality Coalition.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/261-acf2022-VTYAb109UXNRNABf.pdf'

Original File Name: CIAQC Advanced Clean Fleets Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-10-17 13:02:16

No Duplicates.

## **Comment 240 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Claire

Last Name: Buysse

Email Address: c.buysse@theicct.org

Affiliation:

Subject: ICCT comments on the proposed Advanced Clean Fleets regulation

Comment:

Comments are attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/262-acf2022-BmUGb1E9VmgGZQhm.pdf'

Original File Name: comments\_final.pdf

Date and Time Comment Was Submitted: 2022-10-17 13:12:38

No Duplicates.

## **Comment 241 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: David

Last Name: Lax

Email Address: lax@api.org

Affiliation: American Petroleum Institute

Subject: API Comments on the Proposed Advanced Clean Fleets Regulation

Comment:

Please see the attached letter.

Thank you,

David Lax

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/263-acf2022-UjNRJ1M7UV1VMFQ7.pdf'

Original File Name: API Comments\_CARB Proposed ACF Rule\_final .pdf

Date and Time Comment Was Submitted: 2022-10-17 13:19:59

No Duplicates.

## **Comment 242 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Daniel

Last Name: Barad

Email Address: daniel.barad@sierraclub.org

Affiliation: Sierra Club California

Subject: 591 Californians Ask CARB for a Stronger ACF Rule

Comment:

Attached are comments from 591 Californian's asking CARB to adopt a stronger Advanced Clean Fleets Rule more in line with Alternative 2 in the Initial Statement of Reasons. Specifically, they asked that CARB strengthen ACF by:

1. Requiring 100% zero emission truck sales in California by 2036 (instead of 2040, as proposed)

2. Reducing the size of class 7 and 8 (big rig) fleets covered by this rule from 50 to 10

3. Beginning to transition all trucks to zero emission starting in 2027 (instead of 2030, as proposed)

The comments are all printed in their entirety in the attached document. Some chose to include a personal message which will appear below their signature.

Sincerely,

Daniel Barad

Senior Policy Advocate

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/264-acf2022-AGNWMQR3BDVWDwlo.pdf'

Original File Name: CARB ACF Comments 10.17.pdf

Date and Time Comment Was Submitted: 2022-10-17 13:20:12

No Duplicates.

## **Comment 243 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Nicholas

Last Name: Blair

Email Address: nickb@acwa.com

Affiliation: Essential Public Service Providers

Subject: CARB ACF- Commercially Available ZEVs

Comment:

Attached please find a letter from a coalition of Essential Public Service Providers with recommended standards for determining that a Zero Emission Vehicle is commercially available for purchase.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/265-acf2022-BWZRaARuAj8Aam0D.pdf'

Original File Name: Final\_ Coalition of Essential Public Service Providers Joint Letter 101722.pdf

Date and Time Comment Was Submitted: 2022-10-17 13:21:49

No Duplicates.

## **Comment 244 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Josue  
Last Name: Aguilar  
Email Address: jaguilar@nrdc.org  
Affiliation: Natural Resources Defense Council

Subject: NRDC Public Comments  
Comment:

Dear California Air Resources  
Board:

Please accept these 2,648 public comments from members and online activists of the Natural Resources Defense Council (NRDC) urging you to strengthen your Advanced Clean Fleets rule from the current proposal. As it stands, this standard wouldn't go far enough to keep our communities safe from harmful air pollution caused by trucks.

Californians have had to deal with dangerous levels of nitrogen oxide (NOx) and particulate matter (PM) in our air for too long. This is an environmental justice issue: communities of color and low-income communities are the most likely to be nearby major freight routes and therefore exposed to this pollution. As a result, residents face greater risks of asthma, lung cancer, heart disease, and strokes.

The current proposal leaves too many of California's buses and trucks unaccounted for. In addition, it would fail to get us to 100% zero-emission truck fleets by the Governor's goal of 2045. The following changes would strengthen the rule and protect more people from harmful air pollution:

- \* Require 100% zero-emission vehicle sales by 2036
- \* Clean up the biggest and dirtiest vehicles on our road, by regulating tractor trucks fleets with 10 vehicles or more and speeding up their timeline for transitioning to zero-emission

There's no time to waste when it comes to cleaning up our air. We urge you to make these changes to strengthen the rule. Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/266-acf2022-AWBRPVEU6WFwKm0d.pdf>'

Original File Name: NRDC Public Comments Round 1.pdf

Date and Time Comment Was Submitted: 2022-10-17 13:20:46



No Duplicates.

## **Comment 245 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Elizabeth

Last Name: Leeper

Email Address: eleeper@eid.org

Affiliation: El Dorado Irrigation District

Subject: El Dorado Irrigation District's Comments on Draft Regulatory Language for the Advanced Cle

Comment:

Please see attached El Dorado Irrigation District's comment letter regarding the above-referenced subject.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/267-acf2022-BmtWYVNiWDkBNVd6.pdf'

Original File Name: M1022-022 Clean Fleets Regulation State and Local Government Agency Fleet Requirements.pdf

Date and Time Comment Was Submitted: 2022-10-17 13:29:41

No Duplicates.

## **Comment 246 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Roadstar Trucking In  
Last Name: Ramorino  
Email Address: r.ramorino@roadstartruckinginc.com  
Affiliation: Roadstar Trucking, Inc.

Subject: ACF regulation comments  
Comment:

Roadstar Trucking, Inc.-Hayward, California appreciates the opportunity to provide public comment on the Proposed Advanced Clean Fleets Regulation (ACF). We support a transition to new vehicles that will address climate change, but we fear CARB's plan does not fully address many issues in this transition.

While our fleet size is currently under 50 vehicles, we see logistical problems in rolling out this regulation. We want to understand in concrete terms how CARB will guarantee that the clean electric supply as well as the distribution grid will be reliably capable of supplying the necessary capacity down to the actual transportation location that will need fast charging technology.

We also believe that even with all proposed subsidies for the site level charging infrastructure or Hydrogen or other clean fuels and for the actual zero emission vehicles will fall far short of requirements for individual fleets to put in to service.

While OEMs are making headway in development of zero emissions equipment, these vehicles will remain "test" vehicles for some time before they are proven and reliable. The necessary technician workforce able to support maintenance of these vehicles is also a concern and will take time to develop. In the meantime, we are going to see unacceptable reliability.

We have not seen detailed information regarding cost to the supply chain customers dependent on trucking. It is too simplistic to say that electric vehicles will be cheaper to operate than diesel powered vehicles.

Carb needs to make the case to the shipping public how these issues will be addressed.

We urge you to amend the ACF regulation for more flexibility so that the regulation catches up with technology and not technology catching up with the regulation.

Thank you,  
Robert Ramorino  
President  
Roadstar Trucking, Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 13:30:55

No Duplicates.

## **Comment 247 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Dan

Last Name: Bogard

Email Address: warren.bogard@gm.com

Affiliation:

Subject: General Motors comments on ACF proposal

Comment:

General Motors appreciates the opportunity to comment on the ACF rulemaking and looks forward to continued collaboration.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/269-acf2022-VWdRZ1NgUjNVfQU0.pdf'

Original File Name: 2022.10.17\_GM\_comments\_ACF\_submitted.pdf

Date and Time Comment Was Submitted: 2022-10-17 13:37:55

No Duplicates.

## **Comment 248 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Miles

Last Name: Heller

Email Address: HELLERMT@AIRPRODUCTS.COM

Affiliation: Air Products

Subject: Advanced Clean Fleets Comments

Comment:

We appreciate the opportunity to comment on this important item. Please find our comments attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/270-acf2022-WzoFalUmWFRWIA17.pdf'

Original File Name: Air Products Comments for Draft Advanced Clean Fleets Regulation final.pdf

Date and Time Comment Was Submitted: 2022-10-17 13:41:14

No Duplicates.

**Comment 249 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Vincent

Last Name: Sullivan

Email Address: Vincent@sullivanpetroleum.com

Affiliation:

Subject: RE: Title 13. Public Hearing to Consider Proposed Advanced Clean Fleets Regulation  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/271-acf2022-WzhTOlQ4BDVWPwVa.docx'

Original File Name: COMBO WHOLESALE-RETAIL - CARB Advanced Clean Fleet  
Proposed Regulation 2022 (1).docx

Date and Time Comment Was Submitted: 2022-10-17 13:50:33

No Duplicates.

**Comment 250 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: tim

Last Name: hester

Email Address: trucktimetransport@sbcglobal.net

Affiliation:

Subject: Proposed Advanced Clean Fleets Regulation

Comment:

this regulation is hurting my small business

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 13:58:09

No Duplicates.



**Comment 251 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Nick

Last Name: Staub

Email Address: [nick.staub@edstaub.com](mailto:nick.staub@edstaub.com)

Affiliation:

Subject: Reasons I oppose the Advanced Clean Fleets regulation

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/273-acf2022-VjVcO10uVWQGXwhp.docx>'

Original File Name: CARB Advanced Clean Fleet Proposed Regulation 2022.docx

Date and Time Comment Was Submitted: 2022-10-17 13:58:14

No Duplicates.

## **Comment 252 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Manny

Last Name: Leon

Email Address: mleon@rebuildca.org

Affiliation: California Alliance for Jobs

Subject: ACF proposal - Formal Comments Submitted

Comment:

Hello,

Attached you will find the formal comment letter regarding the proposed Advanced Clean Fleets regulation submitted by the California Alliance for Jobs and Rebuild Southern California Partnership.

Thank you

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/274-acf2022-VDVVMaZhVFgAZVU6.pdf'

Original File Name: ACF\_Comment\_Letter\_10\_17\_22 - Final.pdf

Date and Time Comment Was Submitted: 2022-10-17 13:57:24

No Duplicates.

## **Comment 253 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation: Coalition of 42 Stakeholders

Subject: Comment Letter: Advanced Clean Fleets Regulation

Comment:

Please find attached a letter from 42 stakeholders commenting on the proposed Advanced Clean Fleets regulation. Thank you for considering our views.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/275-acf2022-B2ZTNlw7Aw8FYAVq.pdf'

Original File Name: ACF Coalition Letter October 2022 FINAL.pdf

Date and Time Comment Was Submitted: 2022-10-17 13:59:20

No Duplicates.

## **Comment 254 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Marla

Last Name: Carlson

Email Address: mcarlson@amberresources.com

Affiliation:

Subject: Comment on Proposed Advanced Clean Fleet Regulations

Comment:

October  
10-17-22

Clerk of the  
Board  
California Air  
Resources Board  
1001 I Street,  
Sacramento, California 95814

RE: Title 13.

Public Hearing to Consider Proposed Advanced Clean Fleets  
Regulation

I write in strong opposition to the proposed Advanced Clean Fleets rule as I believe it will have significant negative ramifications on the state of California. Mandating the transition to zero emission fleets, at a time when there is limited and an extremely costly supply on the market for heavy duty ZEVs, a lack of comprehensive infrastructure in the state, and we are grappling with an unreliable grid, will only serve to drive up the costs of all goods in the state, and increase the cost of living for many of us who are just trying to survive.

It will also create immense uncertainty surrounding the availability of goods, many of which are critical necessities, if these ZEV heavy duty vehicles cannot travel at a comparable distance to their internal combustion engine counterparts. Breaks or bottlenecks in our supply chains will have extensive consequences on the economy, which could create shortages and further increase the price of goods.

This proposal will be the most damaging to our most vulnerable communities and residents in the state. I am deeply concerned with how the implementation of this regulation, and the corresponding spike in prices for goods and fuel due to the increased costs of operating heavy duty ZEVs, will impact our seniors on fixed incomes, commuters who must travel far distances to get to work because they are priced out of the cities in which they work, and every Californian who will have to bear the brunt of increased electrical bills, but most notably, our low-income households.

For these reasons, I respectfully oppose the adoption of the Advanced Clean Fleets rule.

Sincerely,

Marla Carlson

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/276-acf2022-UDNdOIYIVGVVDANi.docx>'

Original File Name: CARB Advanced Clean Fleet Proposed Regulation 2022.docx

Date and Time Comment Was Submitted: 2022-10-17 14:05:44

No Duplicates.

## **Comment 255 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Timothy

Last Name: Blubaugh

Email Address: avujovic@emamail.org

Affiliation: Truck & Engine Manufacturers Association

Subject: EMA Comments on CARB ACF Rule Proposal

Comment:

The Truck and Engine Manufacturers Association (EMA) hereby submits comments on the proposed Advanced Clean Fleets (ACF) regulation that the California Air Resources Board (CARB) released, along with CARB Staff's Initial Statement of Reasons (ISOR), on August 30, 2022. Included was a proposed regulation to terminate CARB's Advanced Clean Trucks (ACT) rule at the end of 2039 and replace it with a requirement that manufacturers sell only zero-emission vehicles (ZEVs) in California beginning in 2040.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/277-acf2022-ADJWYFRnWDIRCAk4.pdf>'

Original File Name: 2022 10 17 EMA Comments on CARB Proposed ACF Rule.pdf

Date and Time Comment Was Submitted: 2022-10-17 14:13:25

No Duplicates.

## **Comment 256 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Margaret  
Last Name: Edwards  
Email Address: medwards@nsrmca.org  
Affiliation: NSRMCA

Subject: CARB ACF - Comments from The National Star Route Mail Contractors Association  
Comment:

Please see the attached comments from the National Star Route  
Mail Contractors Association.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/278-acf2022-UDZRP1I9UWNROwRb.pdf'

Original File Name: FINAL\_NSRMCA-CARB-ACF-Comment.pdf

Date and Time Comment Was Submitted: 2022-10-17 14:17:18

No Duplicates.

**Comment 257 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Sandra

Last Name: Brown

Email Address: sandie.brown@vpps.net

Affiliation:

Subject: opposition to Proposed Advanced Clean Fleets Regulation (acf2022)

Comment:

Please see attached comment letter

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/279-acf2022-UD9WIANyV2tQJQRt.docx'

Original File Name: Opposition to CARB Advanced Clean Fleet Proposed Regulation 2022.docx

Date and Time Comment Was Submitted: 2022-10-17 14:16:23

No Duplicates.



**Comment 258 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kathleen

Last Name: Hollowell

Email Address: KHOLLOWELL@BOYETT.NET

Affiliation: Boyett

Subject: Opposition to the Proposed Advanced Clean Fleets Regulation

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/280-acf2022-ViZWJVc0AD8KZVAz.pdf'

Original File Name: Public Comments to CARB Advanced Clean Fleet Proposed Regulation (10-17-2022).pdf

Date and Time Comment Was Submitted: 2022-10-17 14:17:10

No Duplicates.

## **Comment 259 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Elizabeth

Last Name: Bourbon

Email Address: elizabeth.bourbon@valero.com

Affiliation: Valero

Subject: Valero Comments on Advanced Clean Fleets

Comment:

Attached please find Valero's comments on the proposed Advanced Clean Fleets regulation. Please let me know if you have any trouble accessing the attached documents. Thank you very much  
- Elizabeth Bourbon

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/281-acf2022-B2QBaAR0VVxRam0D.pdf'

Original File Name: Valero Comments on Advanced Clean Fleets Regulation.pdf

Date and Time Comment Was Submitted: 2022-10-17 14:16:30

No Duplicates.

## **Comment 260 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Eva

Last Name: Plajzer

Email Address: [eplajzer@sdewa.org](mailto:eplajzer@sdewa.org)

Affiliation: San Diego County Water Authority

Subject: Advanced Clean Fleets Regulations Proposed Public Fleet Requirements

Comment:

Please see attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/282-acf2022-WygBY1IwVnJRNgJd.pdf>'

Original File Name: SDCWA Letter 10172022 - CARB Proposed Clean Fleets Regulations.pdf

Date and Time Comment Was Submitted: 2022-10-17 14:27:24

No Duplicates.

**Comment 261 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kerry  
Last Name: Shapiro  
Email Address: kshapiro@jmbm.com  
Affiliation: CalCIMA

Subject: Comments on ISOR  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/283-acf2022-Wj9WaARRrU2wNm0d.pdf'

Original File Name: LTR to CARB re Comments on ACF ISOR 20221017 (Signed).pdf

Date and Time Comment Was Submitted: 2022-10-17 14:34:07

No Duplicates.

## **Comment 262 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: East

Last Name: Peterson-Trujillo

Email Address: ept@citizen.org

Affiliation:

Subject: 900+ in support of strong clean fleet standards

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/284-acf2022-VjUFYl0DADIDZlcx.pdf'

Original File Name: CA ACF Rules Comment.pdf

Date and Time Comment Was Submitted: 2022-10-17 14:44:28

No Duplicates.

## **Comment 263 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Steven

Last Name: Poncelet

Email Address: stevenponcelet@tdpud.org

Affiliation: Truckee Donner Public Utility District

Subject: Truckee Donner PUD Comment on ACF Public Fleets Draft Rule

Comment:

Dear CARB Board and staff,  
Truckee Donner Public Utility District appreciates the opportunity to comment on the Advanced Clean Fleets, Public Fleets, Draft Rule. Please reach out to us if you have questions or if we can be of any assistance.  
Regards,  
Steven Poncelet, TDPUD

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/285-acf2022-Wi4CYAZ3AiRXNQFe.pdf'

Original File Name: TDPUD CARB ACF Comment Letter Executed - FINAL 10-17-22.pdf

Date and Time Comment Was Submitted: 2022-10-17 14:45:33

No Duplicates.

## **Comment 264 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Sourabh

Last Name: Pansare

Email Address: sourabh.s.pansare@p66.com

Affiliation:

Subject: Phillips 66 comments on the proposed Advanced Clean Fleets Regulation

Comment:

Dear Chair

Randolph and Members of the Board,

Please see attached Phillips 66 comments on the proposed Advanced Clean Fleets Regulation.

Thank you.

Sincerely,

Sourabh Pansare

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/286-acf2022-UTAFYANkAg4HYIU6.pdf>'

Original File Name: ACF comment letter\_Phillips 66\_10.17.2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 14:35:17

No Duplicates.

## **Comment 265 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Richard  
Last Name: Abel  
Email Address: lenski@richabel.net  
Affiliation: Concerned Citizen & Taxpayer

Subject: PROPOSED ADVANCED CLEAN FLEETS REGULATION  
Comment:

October 17,  
2022

Clerk of the  
Board  
California Air  
Resources Board  
1001 I Street,  
Sacramento, California 95814

RE: Title 13.  
Public Hearing to Consider Proposed Advanced Clean Fleets  
Regulation

I write in strong opposition to the proposed Advanced Clean Fleets rule as I believe it will have significant negative ramifications on the state of California. Mandating the transition to zero emission fleets, at a time when there is limited and an extremely costly supply on the market for heavy duty ZEVs, a lack of comprehensive infrastructure in the state, and we are grappling with an unreliable grid, will only serve to drive up the costs of all goods in the state, and increase the cost of living for many of us who are just trying to survive. It will also create immense uncertainty surrounding the availability of goods, many of which are critical necessities, if these ZEV heavy duty vehicles cannot travel at a comparable distance to their internal combustion engine counterparts. Breaks or bottlenecks in our supply chains will have extensive consequences on the economy, which could create shortages and further increase the price of goods. This proposal will be the most damaging to our most vulnerable communities and residents in the state. I am deeply concerned with how the implementation of this regulation, and the corresponding spike in prices for goods and fuel due to the increased costs of operating heavy duty ZEVs, will impact our seniors on fixed incomes, commuters who must travel far distances to get to work because they are priced out of the cities in which they work, and every Californian who will have to bear the brunt of increased electrical bills, but most notably, our low-income households. There are many issues that face our state, one of them being the ability to produce enough electricity for all our citizens, and then transition to cleaner fuels / options as the infrastructure is developed and strengthened. Now is NOT the time to implement these regulations!!! For these reasons, I respectfully oppose the



adoption of the Advanced Clean Fleets rule.  
Sincerely,  
Richard Abell10603 Gainsborough  
CourtBakersfield, CA  
93312

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 14:48:48

No Duplicates.

## **Comment 266 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Sarah  
Last Name: Taheri  
Email Address: staheri@sdge.com  
Affiliation: SDG&E

Subject: SDG&E Comments on the Proposed Advanced Clean Fleets Regulation  
Comment:

Attached please find San Diego Gas & Electric Company (SDG&E) comments on the proposed Advanced Clean Fleets regulatory language. Thank you for your consideration.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/288-acf2022-BnUAYgBmWW8FXANg.pdf'

Original File Name: SDGE\_Comments\_ACF\_Proposed\_Regulations\_10.17.2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 14:43:33

No Duplicates.

**Comment 267 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kayla

Last Name: Robinson

Email Address: kayla@caleec.com

Affiliation:

Subject: Coalition of Waste Management Providers Implementing SB 1383

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/289-acf2022-BnUAZFAOVtdWYwgw.pdf'

Original File Name: SB 1383 Hauler Coalition ACF Letter\_final.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:07:01

No Duplicates.

## **Comment 268 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Erin

Last Name: Bednar

Email Address: erin.bednar@vpps.net

Affiliation:

Subject: RE: Title 13. Public Hearing to Consider Proposed Advanced Clean Fleets Regulation  
Comment:

I write in strong opposition to the proposed Advanced Clean Fleets rule as I believe it will have significant negative ramifications on the state of California. Mandating the transition to zero emission fleets, at a time when there is limited and an extremely costly supply on the market for heavy duty ZEVs, a lack of comprehensive infrastructure in the state, and we are grappling with an unreliable grid, will only serve to drive up the costs of all goods in the state, and increase the cost of living for many of us who are just trying to survive.

It will also create immense uncertainty surrounding the availability of goods, many of which are critical necessities, if these ZEV heavy duty vehicles cannot travel at a comparable distance to their internal combustion engine counterparts. The area in which I currently live would be impossible to make this feasible. Travel in any direction would not be possible in one charge and requires driving through mountain highways. Charging stations along these routes would likely be lost in wildfires. These limitations would cause breaks or bottlenecks in our supply chains will have extensive consequences on the economy, which could create shortages and further increase the price of goods.

This proposal will be the most damaging to our most vulnerable communities and residents in the state. I am deeply concerned with how the implementation of this regulation, and the corresponding spike in prices for goods and fuel due to the increased costs of operating heavy duty ZEVs, will impact our seniors on fixed incomes, commuters who must travel far distances to get to work because they are priced out of the cities in which they work, and every Californian who will have to bear the brunt of increased electrical bills, but most notably, our low-income households.

For these reasons, I respectfully oppose the adoption of the Advanced Clean Fleets rule.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 15:11:39

No Duplicates.

**Comment 269 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Hannah

Last Name: Davidson

Email Address: h davidson@hvlcsd.org

Affiliation: Hidden Valley Lake Community Services Di

Subject: ACF ISOR Public Comment - HVLCSD

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/291-acf2022-WzIBdFA+BSQGX1Mj.pdf'

Original File Name: ISOR Public Comment - HVLCSD.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:13:08

No Duplicates.

**Comment 270 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Tanya  
Last Name: DeRivi  
Email Address: tderivi@wspa.org  
Affiliation: WSPA

Subject: Comments on ACF Regulation ISOR Draft EA  
Comment:

Please see attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/292-acf2022-Wi1VIAFwVGZQCVc2.pdf'

Original File Name: WSPA ACF Comment Letter ISOR EA 10-17-2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:12:48

No Duplicates.

**Comment 271 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Andy

Last Name: Schwartz

Email Address: anschwartz@tesla.com

Affiliation: Tesla, Inc.

Subject: Tesla, Inc.'s Comments on Proposed Advanced Clean Fleets Regulation  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/293-acf2022-UyddPIUnUW4EY1QL.pdf'

Original File Name: Tesla comments on August 2022 proposed ACF regulations\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:03:48

No Duplicates.

**Comment 272 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ginger  
Last Name: Giddings  
Email Address: ginger.giddings@calchamber.com  
Affiliation: CalChamber

Subject: Proposed Advanced Clean Fleets (ACF) Regulation  
Comment:

Please see attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/295-acf2022-VTZdOlwxUGADbVU0.pdf'

Original File Name: CalChamber - CARB ACF Rulemaking Letter.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:20:04

No Duplicates.



**Comment 273 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Sam

Last Name: Appel

Email Address: [sappel@bluegreenalliance.org](mailto:sappel@bluegreenalliance.org)

Affiliation: BlueGreen Alliance

Subject: Labor Recommendations to CARB Concerning the Advanced Clean Fleet Rule  
Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/296-acf2022-Uz9cO1c0ADwCdlUK.pdf>'

Original File Name: Labor Memo To CARB - ACF - July 7 2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:23:25

No Duplicates.

## **Comment 274 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Tracy

Last Name: Fidell

Email Address: tfidell@portoakland.com

Affiliation:

Subject: Port of Oakland comments on proposed ACF regulation

Comment:

Please see attached letter providing Port of Oakland's comments on the proposed ACF regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/297-acf2022-AnIAaQFyVHNSC1Q7.pdf'

Original File Name: Port of Oakland ACF comment letter 221017.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:27:00

No Duplicates.

## **Comment 275 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: David

Last Name: Oliver

Email Address: david@caliberstrat.com

Affiliation: Caliber Strategies

Subject: Remora Comments on Proposed ACF Regulation

Comment:

Remora is pleased to provide the Board with the attached comments on the Proposed Advanced Clean Fleet Regulations.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/298-acf2022-UWBWYFJ9UzEBMFB+.pdf'

Original File Name: 10.17.2022 Remora ACF Regulation Comments.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:31:49

No Duplicates.

**Comment 276 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kerry  
Last Name: Shapiro  
Email Address: ks4@jmbm.com  
Affiliation: CalCIMA

Subject: Comments on Advanced Clean Fleets Regulation ISOR  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/299-acf2022-WzdcLlckUFwAcgZp.pdf'

Original File Name: LTR to CARB re Comments on ACF ISOR 20221017 (Signed).pdf

Date and Time Comment Was Submitted: 2022-10-17 15:40:12

No Duplicates.

**Comment 277 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Austin

Last Name: Avery

Email Address: asavery@TID.org

Affiliation: Turlock Irrigation District

Subject: TID Comments on Proposed Advanced Clean Fleets Regulation

Comment:

Turlock Irrigation District comments on Proposed ACF 45 Day  
Language.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/300-acf2022-  
UydVJgR3U2xVPANg.pdf'

Original File Name: Turlock Irrigation District Comments on on the August 30 2022 ACF 45-  
day regulatory package.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:34:45

No Duplicates.

## **Comment 278 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Windmera  
Last Name: Quintanar  
Email Address: wquintanar@cityoflosalamitos.org  
Affiliation:

Subject: COMMENTS ON THE DRAFT ACF PUBLIC FLEETS REGULATORY LANGUAGE

Comment:

The City of Los Alamitos appreciates the opportunity to provide comments on the Advanced Clean Fleets (ACF) draft regulatory language (September 2 iteration) for public fleets as presented at the California Air Resources Board's (CARB) July 26 public workshop.

Given that zero-emission vehicle (ZEV) availability is critical to the successful implementation of the ACF rule, we have focused on these provisions in our comments. Our core recommendations are for CARB to include a robust, transparent framework to assess ZEV commercial availability, as well as a separate exemption process when ZEVs are not accessible to public agencies in practice or are unsuitable for the fleet's operational needs.

The proposed regulations ignore existing market realities and the time needed to develop and ramp up an infrastructural system that can support an electrified fleet of waste, water, and sewer utility vehicles.

For example, existing zero-emission technology limits a garbage truck's range to 100 miles or less, with a payload loss of 6,000 to 7,000 pounds. This reduction in payload capacity, combined with the time needed to charge a truck, means that agencies would need two garbage trucks for each one in service, significantly increasing costs for both vehicle infrastructure and labor.

Many of these vehicles are not commercially available. If a city has planned for supporting infrastructure and budgeted for such purchases, it should be recognized by CARB and receive an extension for compliance instead of being penalized for vehicles not yet available. The proposed regulations should also be modified to ensure that established and reliable manufacturers can adequately produce and service these vehicles for years to come.

If required to follow the proposed regulation as drafted, the projected infrastructure and fleet costs will add substantial rate increases across multiple public works and utility service departments. Cities across the state are pursuing environmentally sound and robust strategies to decarbonize their communities. However, this proposed regulatory language does not account for rising utility costs, and substantial mandates from multiple regulatory bodies, so we urge CARB to

consider these impacts to ensure success for communities without further exacerbating the affordability issues facing many of our cities and residents.

Again, thank you for allowing us the opportunity to provide written responses to the proposed Advance Clean Fleets Regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/301-acf2022-BWpdK1AhUm5SJ1Uw.pdf>'

Original File Name: Oppose- Advanced Clean Fleets Proposal by the California Air Resources Board (CARB).pdf

Date and Time Comment Was Submitted: 2022-10-17 15:41:22

No Duplicates.

**Comment 279 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: ZeeLaura

Last Name: Page

Email Address: zpage@cityofpleasantonca.gov

Affiliation:

Subject: City of Pleasanton ACF Public Fleet Comments

Comment:

Attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/302-acf2022-UjFTPFEkACoFXABv.pdf'

Original File Name: City of Pleasanton ACF Public Fleet Comments.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:44:20

No Duplicates.



## **Comment 280 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jeffrey

Last Name: Clarke

Email Address: jclarke@NGVAmerica.org

Affiliation: NGVAmerica

Subject: NGVAmerica Comments Regarding the Proposed Advanced Clean Fleets Regulation (acf2022)

Comment:

Please accept the attached comments submitted by NGVAmerica.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/303-acf2022-UjwGZ1IIBTcDaFA1.pdf'

Original File Name: NGVAmerica Comments CARB Advanced Clean Fleet Proposal Oct 17 2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:44:08

No Duplicates.

## **Comment 281 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Laurel

Last Name: Moorhead

Email Address: lmoorhead@transferflow.com

Affiliation: Transfer Flow

Subject: Transfer Flow Inc.'s Advanced Clean Fleets Public Comment  
Comment:

Please see the attached document

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/304-acf2022-VDtcOQZzVGgLb1cy.pdf'

Original File Name: October 17th, 2022 Advanced Clean Fleets Public Comment.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:49:54

No Duplicates.

## **Comment 282 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Nick

Last Name: Chiappe

Email Address: [nchiappe@caltrux.org](mailto:nchiappe@caltrux.org)

Affiliation:

Subject: ATA and CTA's Comment on the Proposed Advanced Clean Fleets Regulation.

Comment:

Please find attached the American Trucking Associations (ATA) and the California Trucking Association's (CTA) comments on the Proposed Advanced Clean Fleets (ACF2022) regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/305-acf2022-U2FTZVJhB2ZXfwRn.pdf>'

Original File Name: 2022.CTA-ATA.ACF Comments Final 10172022.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:53:27

No Duplicates.

## **Comment 283 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Katie  
Last Name: Byrne  
Email Address: katie@sdfarmbureau.org  
Affiliation: San Diego County Farm Bureau

Subject: Proposed ACF Regulation  
Comment:

The San Diego County Farm Bureau strongly supports the Business-Industry Coalition Comments, dated October 13, 2022: California businesses, industries, our employees and the local communities that we serve are in need of your intervention. The proposal that will come before you in October is in need of significant change. Throughout the entirety of the rulemaking process, California's private and public sector stakeholders have continually raised critical implementation issues that have been cast aside. These concerns include vehicle availability (at scale) and supply chain issues that intensify affordability concerns, the necessity to incorporate workable emergency response exemptions, obvious infrastructure readiness questions, regulatory timing and process concerns (including transparency for determining 'commercially available' vehicles), and the need for flexible low-carbon fuel alternatives, amongst others. Since these issues have been not been resolved, we are extremely concerned that the proposed ACF rule will be unworkable in the real world and could result in compromising the delivery of essential goods and services to Californians. The COVID-19 pandemic, the supply chain crisis and inflation challenges are making it difficult for Californians. There is a great deal of financial uncertainty that exists for California, and it is harmful to further sow uncertainty and potential hardship. CARB needs its stakeholders to be successful and would make great strides by directing staff to work with us, in earnest, to develop workable, affordable, and timely solutions to this major regulatory effort before it is finalized next year.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 15:54:21

No Duplicates.

**Comment 284 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ryan

Last Name: Kocher

Email Address: ryan.kocher@knighttrans.com

Affiliation: Knight-Swift Transportation

Subject: Advanced Clean Fleets Regulation - Comments from Knight-Swift

Comment:

Please find the attached comment letter from Knight-Swift Transportation regarding the proposal of the 2022 Advanced Clean Fleets Regulation.

Thank you for the opportunity to comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/307-acf2022-U2EHMVRnUDEHMFJi.pdf'

Original File Name: 20221017\_CARB ACF Comments\_KNX.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:58:21

No Duplicates.

**Comment 285 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Brandon

Last Name: Beaudette

Email Address: BBeaudette@SantaBarbaraCA.gov

Affiliation:

Subject: City of Santa Barbara Comments to Advance Clean Fleets

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/308-acf2022-WzhRPgdyACoCWwhn.pdf'

Original File Name: City of Santa Barbara Comments to Advance Clean Fleets 10-17-2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 16:02:40

No Duplicates.

**Comment 286 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Rick

Last Name: Marshall

Email Address: rmarshall@brady.com

Affiliation:

Subject: AGC Members: The Industry and Your Companies are at Risk

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/309-acf2022-BWNSOwZ1UG4GLgRo.pdf'

Original File Name: form.letter.acf.10.2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 16:04:20

No Duplicates.



## **Comment 287 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Vincent

Last Name: C.

Email Address: vincent@fargo-trucking.com

Affiliation:

Subject: Premature Tech, limited refueling/charging infrastructure, financial burden of clean fleets

Comment:

Law makers need to take a ride a long in various segments of the trucking industry to get a better understanding of implementing clean fleet regulation in order to understand the various technology/practicallity gaps, cost impacts, and business risks assocaited with the regulation they are proposing. Large and well capitalized players can eventually corner the market and monopolize the industry. Smaller carriers bring liquidity to a tight market and more specialized service. The barriers to entry for clean fleets will push smaller carriers out of the market and again reduce much needed supply of truck drivers. Financial instruments that would mitigate risk for smaller fleets would go a long way toward leveling the playing field for the proposed clean fleet regulations. Modifications to weight limits to accomodate newer clean fleets will have to line up with existing regulation or mandates to limit weights of clean vehicles with minimum ranges would be a start. Perhaps implemment regulation on techonological goals rather than to force the industry to adapt to prematue technology.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 15:41:24

No Duplicates.

## **Comment 288 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jaime

Last Name: Olaiz

Email Address: jor@amadotrucking.com

Affiliation:

Subject: Advanced Clean Fleet Rule - Drayage

Comment:

The proposed requirements within the advanced clean fleet for drayage trucks beginning 1/1/2024 is unrealistic and will cripple an already fragile global supply chain which is one of the primary drivers of current inflation.

There is not enough fueling infrastructure in place to support a mandate requiring all vehicles entered into the statewide Drayage Truck Registry to be zero emissions.

If this rule is adopted, it will no doubt result in thousands of small fleet operators being forced out of business and tens of thousands of drivers out of work.

It is reckless to impose these requirements before the refueling and charging capacity existis, therefore a delay of enacting these mandates until that infrastructure is in place, proven and economical is the only path forward.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 16:09:57

No Duplicates.

**Comment 289 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Michael  
Last Name: Doggett  
Email Address: mike@mjtanklines.com  
Affiliation: MJ Tank Lines

Subject: Advanced Clean Fleets Regulation  
Comment:

Please see attached comments

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/312-acf2022-Uz8FZgB1UXYEZwl7.doc'

Original File Name: Letterhead.doc

Date and Time Comment Was Submitted: 2022-10-17 16:21:51

No Duplicates.

## **Comment 290 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: John

Last Name: Kinsey

Email Address: jkinsey@wjhattorneys.com

Affiliation: Wanger Jones Helsley PC

Subject: Comments on Proposed Advanced Clean Fleets Regulation

Comment:

The comments on this issue are contained in the attached file.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/313-acf2022-BmUFbFY6BDoHZFQ6.pdf'

Original File Name: Comments on Proposed Advanced Clean Fleets Regulation.SIGNED.101722 (01494358).pdf

Date and Time Comment Was Submitted: 2022-10-17 16:24:26

No Duplicates.

## **Comment 291 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Elisabeth

Last Name: de Jong

Email Address: edejong@scppa.org

Affiliation: SCPPA

Subject: Joint NCPA, SCPPA, CMUA Comments on Proposed ACF Rule

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/314-acf2022-AmhQOVM7V2oFd1IN.pdf'

Original File Name: Joint Public Agency Letter for 45 day ACF Rule 10.17.2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 15:56:43

No Duplicates.

## **Comment 292 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Priscilla

Last Name: Quiroz

Email Address: Priscilla@SYASLpartners.com

Affiliation: Shaw Yoder Antwih Schmelzer & Lange

Subject: SWANA Comment on Proposed Advanced Clean Fleets Regulations

Comment:

Please see the attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/315-acf2022-B3RRIARkBThWMQJd.pdf'

Original File Name: SWANA LTF ACF Comment letter FINAL\_ 10.17.22.pdf

Date and Time Comment Was Submitted: 2022-10-17 16:17:09

No Duplicates.

## **Comment 293 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Marina Del Pilar

Last Name: Avila Olmeda

Email Address: Non-web submitted comment

Affiliation:

Subject: Letter from Governor of the State of Baja California

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/316-acf2022-UTJSO1E9Az0DYAVr.pdf'

Original File Name: Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-10-17 16:30:13

No Duplicates.

## **Comment 294 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Hoi-Fei

Last Name: Mok

Email Address: hfmok@sanleandro.org

Affiliation: City of San Leandro

Subject: Public comment from City of San Leandro for Proposed Advanced Clean Fleets Regulation

Comment:

To whom it may concern,  
Please find attached the public comments on behalf of the Mayor  
of the City of San Leandro for the Proposed Advanced Clean Fleets  
Regulation.  
sincerely,  
Hoi-Fei Mok  
Sustainability Manager  
City of San Leandro

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/317-acf2022-VTRWNFEU2EDawZl.pdf'

Original File Name: Advanced Clean Fleets - California Air Resources Board - Letter of Support Mayor 10-17-22 PDF.pdf

Date and Time Comment Was Submitted: 2022-10-17 16:31:16

No Duplicates.



**Comment 295 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: David

Last Name: Roe

Email Address: davidr@roeoil.com

Affiliation:

Subject: Opposition of Proposed Advanced Clean Fleet Regulation

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/318-acf2022-AWJTNFAjAzJXDgNi.docx'

Original File Name: CARB Advanced Clean Fleet Proposed Regulation 2022.docx

Date and Time Comment Was Submitted: 2022-10-17 16:30:06

No Duplicates.

**Comment 296 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Elizabeth

Last Name: Stears

Email Address: estears@aee.net

Affiliation: Advanced Energy Economy

Subject: Advanced Energy Economy - ACF Comments

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/319-acf2022-VjcFYF06AAwDZlc4.pdf'

Original File Name: ACF Comments 10\_17\_22.pdf

Date and Time Comment Was Submitted: 2022-10-17 16:33:29

No Duplicates.

## **Comment 297 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: patrick  
Last Name: OConnor  
Email Address: patoconnor@kentoconnor.com  
Affiliation: NAFA Fleet Management Assn

Subject: Advance Clean Fleet Rule  
Comment:

Attached please find the comments of NAFA Fleet Management Association.

Thank you

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/320-acf2022-UD9dOAN2VloHMwAw.docx'

Original File Name: Oct 2022 ARB COMMENTS docx.docx

Date and Time Comment Was Submitted: 2022-10-17 16:38:20

No Duplicates.

## **Comment 298 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: John

Last Name: Kinsey

Email Address: jkinsey@wjhattorneys.com

Affiliation: Wanger Jones Helsley PC

Subject: Comments on Proposed Advanced Clean Fleets Regulation

Comment:

Please see the comments attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/321-acf2022-VTZQOVY6BzlRMgln.pdf'

Original File Name: Comments on Proposed Advanced Clean Fleets Regulation.SIGNED.101722 (01494358).pdf

Date and Time Comment Was Submitted: 2022-10-17 16:39:32

No Duplicates.

**Comment 299 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Michael

Last Name: Pimentel

Email Address: michael@caltransit.org

Affiliation: California Transit Association

Subject: California Transit Association - Letter on Advanced Clean Fleets Regulation

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/322-acf2022-AmFcLlMzUV1SNQZi.pdf'

Original File Name: CTA Advanced Clean Fleets Regulation.pdf

Date and Time Comment Was Submitted: 2022-10-17 16:43:07

No Duplicates.

**Comment 300 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: James

Last Name: Talavera

Email Address: james.talavera@ladwp.com

Affiliation: Los Angeles Department of Water and Powe

Subject: Los Angeles Department of Water and Power Comments on the Advanced Clean Fleets Regulation

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/323-acf2022-AGxSNQZjVXEGcAdY.pdf'

Original File Name: LADWP ACF Comment Letter 10-17-22.pdf

Date and Time Comment Was Submitted: 2022-10-17 16:55:26

No Duplicates.

**Comment 301 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jack

Last Name: Kelly

Email Address: jkelly@andretti1.com

Affiliation:

Subject: Humboldt Petroleum

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/324-acf2022-VDwAc1Y6VmcKYwVp.pdf'

Original File Name: Humboldt Petroleum - CARB Advanced Clean Fleet Proposed Regulation.pdf

Date and Time Comment Was Submitted: 2022-10-17 16:49:12

No Duplicates.

**Comment 302 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jack

Last Name: Kelly

Email Address: jkelly@andretti1.com

Affiliation:

Subject: Peninsula Petroleum

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/325-acf2022-B3cCYVY5UmgHb1Mg.pdf'

Original File Name: Peninsula Petroleum - CARB Advanced Clean Fleet Proposed Regulation 2022 (1).pdf

Date and Time Comment Was Submitted: 2022-10-17 17:02:16

No Duplicates.



## **Comment 303 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Peter

Last Name: Dahling

Email Address: peter.dahling@neste.com

Affiliation:

Subject: Neste Comments on Proposed ACF Regulation (see attached)

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/326-acf2022-UD5SMVEjVHMBY1QL.pdf'

Original File Name: Neste\_ACF\_Comments\_10-17-22.pdf

Date and Time Comment Was Submitted: 2022-10-17 17:02:45

No Duplicates.

## **Comment 304 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Charles

Last Name: Darensbourg

Email Address: cdarensbourg@dpw.lacounty.gov

Affiliation: Los Angeles County Public Works

Subject: Comments on the ACF Rulemaking

Comment:

Thank you

for the opportunity to provide comments on the Proposed Advanced Clean Fleet (ACF) Regulations. Attached is Los Angeles County Public

Work's comment letter on the ACF.

In

summary, Public Works recommends the following before adopting the ACF Regulations:

- Align ACF regulations with SB 1383 regulations to help the State meet its carbon neutrality goals
- Support existing markets for RNG to immediately replace highly polluting diesel engines
- Distinguish SB 1383 compliant RNG from fossil natural gas
- Synchronize the electrification infrastructure and heavy-duty ZEV targets
- Simplify the exemption process

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/327-acf2022-WjsCZ1A3AAwEYVM8.pdf'

Original File Name: ACF Comment Letter and Enclosure (003).pdf

Date and Time Comment Was Submitted: 2022-10-17 16:53:11

No Duplicates.

**Comment 305 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kristian

Last Name: Corby

Email Address: kristian@caletc.com

Affiliation: CalETC

Subject: CalETC's Comments on the Proposed Advanced Clean Fleets Rule  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/328-acf2022-VDcAZ1U4VWNRI1Mw.pdf'

Original File Name: CalETC ACF Oct Board Meeting Comments Final.pdf

Date and Time Comment Was Submitted: 2022-10-17 17:05:07

No Duplicates.

**Comment 306 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: ALEJANDRO

Last Name: RODRIGUEZ

Email Address: SAFETY@DLR.COM.MX

Affiliation: DLR AUTOTRANSPORTES LLC

Subject: LOOKS GOOD

Comment:

Regulation looks good

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 17:09:01

No Duplicates.

## **Comment 307 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Brian

Last Name: Robb

Email Address: brian.robb@thelionelectric.com

Affiliation:

Subject: Lion comments on ACF Rulemaking

Comment:

See attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/331-acf2022-BWRQJAdkBAGDZAFi.pdf'

Original File Name: ARB ACF Letter\_Lion Oct 22.pdf

Date and Time Comment Was Submitted: 2022-10-17 17:12:34

No Duplicates.

## **Comment 308 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ken

Last Name: Dewar

Email Address: ken@jbdewar.com

Affiliation:

Subject: Advanced Clean Fleets Regulation

Comment:

Please see the attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/332-acf2022-UjNWNARzBzUGbghr.docx'

Original File Name: Advanced Clean fuel rule.docx

Date and Time Comment Was Submitted: 2022-10-17 17:14:51

No Duplicates.

**Comment 309 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Alison

Last Name: Torres

Email Address: TORRESA@EMWD.ORG

Affiliation: Eastern Municipal Water District

Subject: Proposed Advanced Clean Fleets Regulation Comments

Comment:

Please refer to the attached comment letter on behalf of Eastern  
Municipal Water District

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/333-acf2022-  
VGYCNgcrAGJSZAUo.pdf'

Original File Name: 22-10-17\_EMWD Comment\_Proposed Advanced Clean Fleets  
Regulation\_Final\_.pdf

Date and Time Comment Was Submitted: 2022-10-17 17:18:18

No Duplicates.

## **Comment 310 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Veronica

Last Name: Pardo

Email Address: veronica@resourcecoalition.org

Affiliation: RRCC

Subject: Waste and Recycling Industry Comments on the Advanced Clean Fleets Rulemaking  
Comment:

The Resource Recovery Coalition of California appreciates the opportunity to comment on the proposed Advanced Clean Fleet regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/334-acf2022-BmcFYF06AjdXPgR2.pdf'

Original File Name: ACFFormalRRCCFinal10.17.22.pdf

Date and Time Comment Was Submitted: 2022-10-17 17:18:31

No Duplicates.



## **Comment 311 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Tom

Last Name: Boyle

Email Address: tboyle@quikpickexpress.com

Affiliation:

Subject: Advanced Clean Fleet Rule - Drayage

Comment:

The proposed requirements within the advanced clean fleet for drayage trucks beginning 1/1/2024 is not feasible. Requiring all new vehicles entering the statewide Drayage Truck Registry to be zero emissions would cripple an already fragile supply chain. The fueling infrastructure and battery technology are not yet ready for mass adoption. I say that as a Motor Carrier who is currently operating multiple zero emission Class 8 drayage tractors. Please consider pushing any initial entry standard for drayage trucks operating in California out until there is a sufficient supply of charging or fueling infrastructure to support the deployment of tens of thousands of zero emissions drayage vehicles. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 17:08:18

No Duplicates.

## **Comment 312 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 313 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Joshua

Last Name: Miller

Email Address: jmilleraofund.org

Affiliation: Accion Opportunity Fund

Subject: Advanced Clean Fleets Regulation (ACF2022)

Comment:

Accion Opportunity Fund appreciates the opportunity to provide public comment and express our concerns regarding the Proposed Advanced Clean Fleets Regulation (ACF). Accion Opportunity Fund is a community development financial institution (CDFI) and the country's leading nonprofit lender to small businesses. For over 25 years, we have worked to create an inclusive, healthy financial system that supports the nation's small business owners by connecting underserved entrepreneurs to affordable capital, educational resources, coaching, and networks. Through innovative partnerships and outreach strategies, we reach entrepreneurs of color, low-income small business owners, and women entrepreneurs who often lack access to the financial services they need to build and grow their businesses.

Although we finance small businesses across all sectors, not only does trucking make up much of our loan portfolio, but we have a long history of working specifically with small business owner-operators in California. In this calendar year alone, we have deployed approximately \$40 million in capital to California truck drivers, with an average loan size of \$100,000. Since inception, we have deployed over \$360 million to more than 5,300 drivers in California to help finance the purchase of their medium and heavy-duty vehicles.

We understand how critical it is to include trucking and the greater transportation industry in California's plans towards a cleaner and safer environment. In 2010, when California's emissions regulations required trucks serving the state's ports be retrofitted with new filters or be taken out of service entirely and replaced, Accion Opportunity Fund stepped in to provide loans to drivers to retrofit their rigs or purchase new ones, enabling them to continue operating at the ports and maintain their income and livelihoods.

As a community-based lender, many of our drivers are of low to moderate income and identify as people of color and immigrants&mdash;communities that often struggle to gain access to affordable capital and are left on the unforgiving side of the racial wealth gap. Our borrowers have shared with us that becoming owner-operators has allowed them broader autonomy over their time and schedules, greater financial stability, and, ultimately, better quality of life for themselves and their families. Financial milestones that were previously out of reach, like paying off debt or putting a down payment for a home, become reality with a career as an owner-operator.

Given our close relationship with truckers in the state and our first-hand knowledge of the industry, we believe the proposed ACF timeline will disadvantage small business owner-operators who move freight in California and beyond, with an even greater disparate impact on low-income truck drivers and drivers of color.

Since 97.4% of all trucking companies are small businesses and operate 20 or less trucks, the rapid transition from fossil fuels to zero emissions will be a major hardship for these small businesses and the industry as a whole&mdash;causing greater barriers for entry and potentially forcing small trucking businesses out of the industry at a time when truckers are in short supply. Most of our trucking borrowers own less than ten trucks, with the majority owning one to three. These small businesses are often at a disadvantage, having to compete with larger, more resourced trucking companies within California and nationally for freight.

We believe that the proposed timeline for zero-emissions equipment would double the cost of doing business for small business owner-operators at a pace that neither we nor our truck drivers and others can keep up with. First-time truck buyers are required to pay a 30-40% down payment on a truck loan. Most new owner-operators choose a used truck as their first purchase, because it is affordable with a price range of \$80,000 to \$140,000 for a heavy-duty vessel. Given that there is no used zero emissions market, new zero emission trucks could cost up to \$400,000, leaving newly-minted owner-operators responsible for coming up with an astonishing \$160,000. Additionally, they would face fierce competition among other buyers as full production of OEM zero emissions trucks has yet to ramp up due to battery, microchip, and other parts shortages.

Beyond obtaining a loan and vehicle, most independent truckers will not be able to afford the higher costs and out-of-pocket expenses to own a zero-emissions truck. Maintenance for these

vessels will be expensive and hard to obtain, given the new technology. Higher insurance premiums are expected. Truckers will even be challenged to find the charging infrastructure needed to power their equipment, especially since most work out of their homes and rent parking space for their trucks and cannot purchase and install their own charging stations.

Until production meets expected demand and infrastructure is well-built out and prepared, considerations should be made to push back rather than speed up the timeline of these regulatory changes. Moving forward with the proposed schedule would adversely impact small trucking businesses—especially those owned by immigrants and entrepreneurs of color—throughout the state.

It should also be noted that while we support the zero-emissions trucking incentives provided by California and the recently passed Inflation Reduction Act, these programs simply do not offset the upfront costs—like down payment—to our borrowers and other small business owner-operators. The incentives would greatly benefit larger truckers and trucking companies with greater means while undermining the small businesses that can least afford the upfront costs.

Action Opportunity Fund supports efforts that address the harms of climate change and pollution. However, we believe this can be achieved with more flexibility within the ACF regulations and its timeline. We ask that the California Air Resources Board reconsider its timeline while reconfiguring the incentives associated with transitioning into zero emissions trucking. In doing so, we can ensure that California leads the green economy without causing undue harm to the livelihoods of the state's small business owner-operators, low-income drivers, and drivers of color.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 17:37:26

No Duplicates.

**Comment 314 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Josiah

Last Name: Young

Email Address: [josiah@josiahyounglaw.com](mailto:josiah@josiahyounglaw.com)

Affiliation: Representing The California Bus Assoc.

Subject: CBA Comment Letter Regarding Issues with Proposed Advanced Clean Fleets (ACF) Regulation

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/338-acf2022-BzZda1R7AmBSY1J8.pdf>'

Original File Name: 10.17.22 CARB ACF LETTER - Submitted.docx.pdf

Date and Time Comment Was Submitted: 2022-10-17 17:36:59

No Duplicates.

## **Comment 315 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Bobby

Last Name: Hernandez

Email Address: bobby.hernandez@vpps.net

Affiliation:

Subject: Advanced Clean Fleets Regulation

Comment:

The terrible legislation , will hurt every industry in this state. Not mention the private owner who ship to our docks and stores. This is going to chase transportation companies to other states as well as kill single owned Truckers.

Please do not vote for this legislation!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 17:45:27

No Duplicates.

## **Comment 316 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Adam

Last Name: Browning

Email Address: [abrowning@forummobility.com](mailto:abrowning@forummobility.com)

Affiliation: Boardmember

Subject: Forum Mobility comments to ACF Regulations

Comment:

Please find comments attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/341-acf2022-VDUBYwRzVWdWPgZl.pdf>'

Original File Name: Advanced Clean Fleets Letter\_Forum Mobility\_10\_17\_22.pdf

Date and Time Comment Was Submitted: 2022-10-17 17:51:34

No Duplicates.



**Comment 317 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Sara

Last Name: Fitzsimon

Email Address: [sfitzsimon@californiahydrogen.org](mailto:sfitzsimon@californiahydrogen.org)

Affiliation: California Hydrogen Business Council

Subject: California Hydrogen Business Council Comments on Proposed ACF  
Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/342-acf2022-AnJXIwRqAiFXPgFy.pdf>'

Original File Name: Proposed ACF Reg\_CHBC Comments 101722.pdf

Date and Time Comment Was Submitted: 2022-10-17 17:54:27

No Duplicates.

**Comment 318 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jessi

Last Name: Davis

Email Address: jdavis6@socalgas.com

Affiliation: SoCalGas

Subject: SoCalGas Comments on Proposed Advanced Clean Fleets Regulation

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/343-acf2022-AnEAaQNhU2EBawhv.pdf'

Original File Name: SoCalGas Comments on Proposed Advanced Clean Fleets Regulation.pdf

Date and Time Comment Was Submitted: 2022-10-17 17:57:02

No Duplicates.

## **Comment 319 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Todd

Last Name: Campbell

Email Address: Todd.Campbell@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: Advanced Clean Fleets: Clean Energy Comment Letter

Comment:

Please find attached a letter from Clean Energy commenting on the proposed Advanced Clean Fleets regulation. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/344-acf2022-UjNXMI06BwtWMwVp.pdf'

Original File Name: ACF Clean Energy Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-10-17 18:05:42

No Duplicates.

## **Comment 320 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Marisol

Last Name: Reyes

Email Address: mreyes@irahetabros.com

Affiliation:

Subject: DIESEL TRUCK CARB LAWS

Comment:

I am EXCEPTIONALLY disappointed in CARB and California for attempting to push laws that will surely DESTROY the lives of small business owners and ordinary Californians by trying to force electric big rigs when 1. there are out of the price range of small businesses 2. there is no infrastructure for these trucks to charge. I know I will vote every politician out that proposes or votes for such a law. Further, I will advise all friends and family to do the same. This is disgustingly stupid for people that run this state to even propose much less carry out. Disgusting.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 18:04:27

No Duplicates.

## **Comment 321 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Noelle

Last Name: Mattock

Email Address: ncmattock@roseville.ca.us

Affiliation: City of Roseville

Subject: Advanced Clean Fleet Comments by City of Roseville

Comment:

The City of Roseville appreciates the opportunity to provide comments on the proposed Advanced Clean Fleet regulation. This letter addresses the unique position of full service city to address SB 1383 and deliver a circular economy. We support the comments of our statewide organizations as well.

Sincerely,  
Noelle Mattock

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/346-acf2022-B2QBafUmVloAZ1U2.pdf>'

Original File Name: COR\_ACF Regulation Comments (FNL) 10.17.22.pdf

Date and Time Comment Was Submitted: 2022-10-17 18:07:13

No Duplicates.

## **Comment 322 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Cara  
Last Name: Simag  
Email Address: csimaga@stericycle.com  
Affiliation: Stericycle

Subject: Comments of Stericycle, Inc. on proposed Advanced Clean Fleet regulation  
Comment:

Please find out comments attached. Thank you.

Cara Simaga, CHMM  
Senior Director, Regulatory  
Affairs  
M 312.720.6213 |  
csimaga@stericycle.com  
stericycle.com

-

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/347-acf2022-WygHdQRgBSQEawZl.pdf'

Original File Name: Stericycle Comments CA ACF 10.17.22.pdf

Date and Time Comment Was Submitted: 2022-10-17 18:15:05

No Duplicates.

## **Comment 323 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Kim

Last Name: Mason

Email Address: kimmiesparkles23@gmail.com

Affiliation:

Subject: CARB Electric Trucks

Comment:

CARB,  
Please do not drown minority owned businesses to push electric big rigs before the state is ready for it. These trucks are out of reach for 90% of the trucking companies in California and most importantly there is no land for these electric trucks to charge, no charging stations for these trucks to charge and not even the inventory of these electric vehicles even if all the infrastructure was in place to support these vehicles. Why is CARB really doing this? Are the members of CARB so hateful towards people of color that own small fleets and companies that they will use the cloak of environmentalism to destroy the industry and businesses? This will end in the collapse of California, because, mind you... Trucking intersects with every other industry. We will be here to remind voters who ruined the state of California if this passes. Businesses are already moving freight out of California Ports.. because of idiotic laws such as AB-5 ... now this... Keep it coming democrats. As a democrat myself, I am profoundly disappointed.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 18:18:32

No Duplicates.

## **Comment 324 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: George

Last Name: Ruiz

Email Address: georgecruizjr@gmail.com

Affiliation:

Subject: Advanced clean fleet

Comment:

We can't afford electric trucks by next year the infrastructure  
is not in place this will destroy California economy

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 18:29:58

No Duplicates.



## **Comment 325 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 326 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Sarah

Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: CA Association of Sanitation Agencies

Subject: CASA Comments on the Proposed ACF Regs - Public Fleet Requirements

Comment:

The California Association of Sanitation Agencies appreciates the opportunity to provide comments on the Proposed Advanced Clean Fleets Regulations, specifically, the State and Local Government Agency Fleet Requirements. We are ready to work closely and collaboratively with CARB staff on this critical effort while reliably maintaining essential public and emergency services for all communities under all conditions. Please contact me with any questions.  
Regards, Sarah Deslauriers  
CASA Climate Change Program Manager

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/351-acf2022-BmUFYlwuVmQDWIM1.pdf'

Original File Name: CASA Formal 10-17-22 Comments\_ACFRegs083022-PublicFleetRequirementsMarkups\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-10-17 18:35:36

No Duplicates.

## **Comment 327 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Tigran

Last Name: Agdaian

Email Address: tagdaian@breathesocal.org

Affiliation: Breathe Southern California

Subject: Strengthening the Proposed Advanced Clean Fleets Regulation

Comment:

Please see the attached letter regarding Breathe Southern California's comments regarding the ACF regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/352-acf2022-AmBWIlw4ADIGdFM7.pdf'

Original File Name: Breathe SoCal ACF Comment Letter Final .pdf

Date and Time Comment Was Submitted: 2022-10-17 18:57:58

No Duplicates.

## **Comment 328 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Chelsea

Last Name: Lee

Email Address: chelsea@betterworldgroup.com

Affiliation: Advanced Clean Fleets Advocacy Coalition

Subject: Support for Strengthening the ACF Rule

Comment:

On behalf of more than 50 environmental justice, labor, health, scientific, business and environmental groups and the communities we represent, we urge the California Air Resources Board (CARB) to direct Staff to strengthen the proposed Advanced Clean Fleets (ACF) rule before final adoption. This can be accomplished by directing Staff to propose for final adoption the recommendations below, included in Alternative 2: Accelerated ZEV Transition, as presented in the Initial Statement of Reasons (ISOR). This includes:

- Moving the 100 percent MHD ZEV sales date from 2040 to 2036;
- and
- Ensuring all Class 7 and 8 tractors are subject to the same transition schedule beginning 2027 while lowering the High Priority Fleet threshold for Class 7 and 8 tractors from 10 or more trucks.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/353-acf2022-WzpRNFQzBAGLbIQ7.pdf'

Original File Name: ACF Coalition Comment Letter\_10-17-2022 (Final).pdf

Date and Time Comment Was Submitted: 2022-10-17 18:54:37

No Duplicates.

## **Comment 329 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Michael

Last Name: Geller

Email Address: mgeller@meca.org

Affiliation: MECA Clean Mobility

Subject: MECA Comments on CARB's Proposed Advanced Clean Fleets Rule  
Comment:

Please find attached comments by MECA Clean Mobility on CARB's proposed Advanced Clean Fleets Rule. Thank you for your consideration.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/355-acf2022-Uz5TMANhAjAHXghp.pdf'

Original File Name: MECA ACF Comments 10172022.pdf

Date and Time Comment Was Submitted: 2022-10-17 19:15:07

No Duplicates.

## **Comment 330 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: City of Fremont

Last Name: .

Email Address: agallo@fremont.gov

Affiliation:

Subject: City of Fremont Comments on the Draft ACF Public Fleets Regulatory Language  
Comment:

Please see letter attached. Submitted by the City of  
Fremont.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/356-acf2022-  
UTJXOFUgUXtRCAdo.pdf'

Original File Name: City of Fremont Comments on the Draft ACF Public Fleets Regulatory  
Language.pdf

Date and Time Comment Was Submitted: 2022-10-17 19:14:01

No Duplicates.

## **Comment 331 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jeffrey

Last Name: Roe

Email Address: jeffr@roeoil.com

Affiliation: Roe Oil Company, Inc.

Subject: CARB Proposed Advanced Clean Fleets Regulations - OPPOSE

Comment:

We oppose the adoption of the Advance Clean Fleets rule as too radical and not based upon any settled and robustly debated science.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/357-acf2022-BWZRNIQnU2IAWQl5.pdf'

Original File Name: CARB Proposed Advanced Clean Fleets Regulation Comments OPPOSE by Roe Oil Company Inc dated 10172022.pdf

Date and Time Comment Was Submitted: 2022-10-17 19:20:24

No Duplicates.

## **Comment 332 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Ruben

Last Name: Aronin

Email Address: ruben@betterworldgroup.com

Affiliation: CA Business Alliance for a Clean Economy

Subject: Businesses Support Key Recommendations to Strengthen ACF Rule and Drive CA Economy Forward

Comment:

As business and industry organizations with a strong commitment to support climate, clean energy and clean transportation initiatives that will grow California's economy and create good paying jobs, we write to express strong business support for adopting a more ambitious Advanced Clean Fleets (ACF) rule that zeros out fossil fuel medium- and heavy-duty (MHD) vehicle sales in 2036 and aligns with Governor Newsom's Executive Order N-79-201. An improved ACF rule is essential to meeting our state's air quality and greenhouse gas reduction targets while advancing our clean energy economy.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/358-acf2022-UzJWM1YxVlpSM1Qx.pdf>'

Original File Name: ACF General Business Advocacy Letter (Final) Oct 2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 19:34:39

No Duplicates.



## **Comment 333 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Roxana  
Last Name: Ramirez  
Email Address: rramirez@mwdh2o.com  
Affiliation: Metropolitan Water District

Subject: Metropolitan's Official Comments on the Proposed Advanced Clean Fleets Regulation  
Comment:

Please find attached Metropolitan's comment letter on ARB's  
45-day rulemaking ACF Draft.  
Best Regards,  
Roxana

Roxana Ramirez  
Environmental  
Specialist  
Water Systems Operations  
Group  
Metropolitan Water District of  
Southern California  
700 North Alameda Street,  
US8-205  
Los Angeles, CA 90012  
Office: 213-217-6407

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/359-acf2022-VDlQIQFkBwsEYVc4.pdf>'

Original File Name: MWD Comments on the 45-day Rulemaking ACF Draft.pdf

Date and Time Comment Was Submitted: 2022-10-17 19:32:57

No Duplicates.

## **Comment 334 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: LEE

Last Name: BROWN

Email Address: LEEBROWN@WESTRK.ORG

Affiliation: WESTERN STATES TRUCKING ASSN

Subject: WESTERN STATES TRUCKING ASSN-ADDITIONAL COMMENTS ON ACF  
Comment:

Please review and reply to the attached comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/360-acf2022-UCdUIVInUWNWDwd0.pdf'

Original File Name: WSTA Submittal and ACF Alternative 8 Comments to CARB Docket 10-17-2022.pdf

Date and Time Comment Was Submitted: 2022-10-17 20:34:52

No Duplicates.

## **Comment 335 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Quinn

Last Name: Piening

Email Address: lobby@ellisonwilson.com

Affiliation: California Tow Truck Association (CTTA)

Subject: CTTA/ERSCA Comments on Proposed CARB Advanced Clean Fleets Regulation  
Comment:

The California Tow Truck Association (CTTA), known nationally as the Emergency Road Service Coalition of America (ERSCA), submits the attached comments on CARB's proposed Advanced Clean Fleets (ACF) regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/361-acf2022-BmUAclAlVmQLUgVm.pdf'

Original File Name: CTTA CARB ACF Comments.pdf

Date and Time Comment Was Submitted: 2022-10-17 20:54:07

No Duplicates.

## **Comment 336 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Inderjit

Last Name: Saini

Email Address: Isaini13@yahoo.com

Affiliation:

Subject: Leniency for single truck owners

Comment:

I would like to request leniency regarding my 2009 motor truck. I am all for cleaning the air and reducing pollution levels in California, however at whose expense? I am a single truck owner making ends meet and raising a family of Five. in 2010 we were told to install a \$15,000 retrofit filter. Of course everyone took advantage of us from the parts people to labor and loan companies with high interest rates. We received no financial assistance. Two years later we were told that our truck was no longer operable and we had to purchase a more recent engine model. Trying to escape the extortionate prices in California we purchased a truck from Utah. Of course the price we paid was not the value of the truck due to this inflated market. When we got it home a week later we had to rebuild the motor and placed over \$13,000 on our credit card to start working. Here we are again 8 years later having to purchase another truck. Each and every time we reached out for financial assistance and each time we were told that there were no more funds available. Why is it that the little man like myself gets trodden on each and every time. Sitting at a desk and creating these heroic laws to save the world sound great on paper, however has anyone sat down and thought of the financial affects on those that suffer the financial burdens? I would like to request that you please reconsider the affect that this is having on my family and many more like us. Picking up \$2-3,000 monthly payments for a new truck during a possible recession will only lead to many being unable to make payments and keep themselves afloat. Work has already slowed down and I am stuck in a difficult situation. Please here our personal stories and help us continue being able to take care of our families and our fellow Americans. Without the sacrifices of the American Trucker this country would come to a stand still.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-17 20:55:44

No Duplicates.

## **Comment 337 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Sean

Last Name: Edgar

Email Address: Sean@CleanFleets.net

Affiliation:

Subject: Clean Fleets Comments re Advanced Clean Fleets Proposal

Comment:

I am attaching comments for the Board's consideration and response.

Thank you,

Sean Edgar

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/363-acf2022-UTIGZgRrU2UGdANc.pdf'

Original File Name: CFNET Comments on ACF to CARB Docket 10-17-22se.pdf

Date and Time Comment Was Submitted: 2022-10-17 21:17:34

No Duplicates.

## **Comment 338 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Brandon

Last Name: Garcia

Email Address: brandon.garcia@asm.ca.gov

Affiliation: California State Legislature

Subject: Advanced Clean Fleet Legislator Sign-on Letter

Comment:

Hello,

I am submitting the attached letter on behalf of Assembly Majority Leader Eloise Gomez Reyes & Senator Lena Gonzalez as well as a number of other state legislators. Please let me know if you have any questions.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/365-acf2022-AWcHaARrADJXPQVa.pdf>'

Original File Name: FINAL Advance Clean Fleet Rule Letter Signed - 10.17.22.pdf

Date and Time Comment Was Submitted: 2022-10-17 21:31:40

No Duplicates.

## **Comment 339 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Justin

Last Name: Boman

Email Address: Justin.Boman@asm.ca.gov

Affiliation: California State Assembly - Mathis

Subject: Comments on Proposed Advanced Clean Fleets Regulation

Comment:

Good Evening,

Please accept the attached comments regarding the proposed advanced clean fleets regulation from Assemblymembers Bigelow, Choi, Dahle, Davies, Fong, Lackey, Mathis, Patterson, Seyarto, Smith, Voepel, and Waldron.

Thank you,

Justin Boman

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/367-acf2022-AWBRJFwuAjQFbgZk.pdf'

Original File Name: Assemblymember Comments - ACF Letter - 10.17.22.pdf

Date and Time Comment Was Submitted: 2022-10-17 22:05:46

No Duplicates.

## **Comment 340 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Jose

Last Name: Aviles

Email Address: Non-web submitted comment

Affiliation:

Subject: Email comment from Jose Aviles

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/368-acf2022-Wj9WPVExBT8AagBf.pdf>'

Original File Name: Email from Jose Aviles.pdf

Date and Time Comment Was Submitted: 2022-10-17 22:50:21

No Duplicates.



## **Comment 341 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Matt

Last Name: Schrap

Email Address: matt@harbortruckers.org

Affiliation: Harbor Trucking Association (HTA)

Subject: HTA Comments on Proposed Advanced Clean Fleets Regulation

Comment:

Please see attached comments from the Harbor Trucking Association on the ACF.

Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/369-acf2022-WjtWM1I1UFwKagFo.pdf'

Original File Name: ACF Final - HTA.pdf

Date and Time Comment Was Submitted: 2022-10-17 22:58:23

No Duplicates.

**Comment 342 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: Pacific Gas & Electric

Subject: PG&E Comments on ACF 45-Day Package

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/370-acf2022-AXEFZFUxUFxRY1Bl.pdf'

Original File Name: PGE 45-Day Comments on ACF\_10-17-22.pdf

Date and Time Comment Was Submitted: 2022-10-17 23:46:32

No Duplicates.

## **Comment 343 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Lisa

Last Name: McGhee

Email Address: lisa@greenpowermotor.com

Affiliation: GreenPower Motor Company

Subject: OEM capacity regarding Advanced Clean Fleet Proposal & Support

Comment:

Please find attached comments by Lisa McGhee of GreenPower Motor Company in support of CARB's long awaited ACF adoption. We share comments from our ZEV MHD manufacturing experience and are available for any follow up.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/371-acf2022-UjNWM1M0VV1SJgF0.pdf'

Original File Name: ACF Rule, GP comments 10-17-22.pdf

Date and Time Comment Was Submitted: 2022-10-17 23:54:11

No Duplicates.

## **Comment 344 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Matt

Last Name: Klenske

Email Address: Non-web submitted comment

Affiliation:

Subject: Fix the ACF (emailed comment)

Comment:

Please see the attached file.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-fundingplan2022-VjAFagR9AAwAcglh.pdf'

Original File Name: Fix the ACF (klenske).pdf

Date and Time Comment Was Submitted: 2022-11-08 12:55:21

No Duplicates.

## **Comment 345 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Annie

Last Name: Guzman

Email Address: Non-web submitted comment

Affiliation:

Subject: Fix the ACF (emailed comment)

Comment:

Please see the attached file.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-fundingplan2022-UjRTPFEoVVkFd1A4.pdf'

Original File Name: Fix the ACF (guzman).pdf

Date and Time Comment Was Submitted: 2022-11-08 12:56:41

No Duplicates.

## **Comment 346 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Andress

Last Name: Alegre

Email Address: Non-web submitted comment

Affiliation:

Subject: Fix the ACF (emailed comment)

Comment:

Please see the attached file.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-fundingplan2022-BWMCbVMqWVUGdARs.pdf'

Original File Name: Fix the ACF (alegre).pdf

Date and Time Comment Was Submitted: 2022-11-08 12:58:12

No Duplicates.

**Comment 347 for Advanced Clean Fleets Regulation (acf2022) - 45 Day.**

First Name: Tamara

Last Name: Ross

Email Address: Non-web submitted comment

Affiliation:

Subject: RE:Title 13. Public Hearing to Consider Advanced Clean Fleets Regulation

Comment:

Please see attached file

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-00docketutility-AjMFMVR4B2YGX1c0.pdf'

Original File Name: 12-2 comment.pdf

Date and Time Comment Was Submitted: 2022-12-05 11:48:54

No Duplicates.

## **Comment 1 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Walied

Last Name: Mohamed

Email Address: waliedboss@yahoo.com

Affiliation:

Subject: Extinction for Trucker regulation

Comment:

<p>We need Extinction for the truck regulation because of pandemic and inflation and bad economic recur</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 08:12:26

No Duplicates.



## **Comment 2 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Victoria

Last Name: Rodriguez

Email Address: vrodriguez@nmgovlaw.com

Affiliation: Enterprise Inc.

Subject: ACF Enterprise Comments

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/374-acf2022-UDUHaQFfAzMLbANx.pdf>

Original File Name: EH CARB Comments - Final - In Person Submission.pdf

Date and Time Comment Was Submitted: 2022-10-27 08:53:19

No Duplicates.

### **Comment 3 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Frank

Last Name: Harris

Email Address: fharris@cmua.org

Affiliation: CMUA

Subject: ACF Public Comment

Comment:

<p>Please see the attached comment.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/375-acf2022-WjlVPI0pUGJSCwZl.pdf>

Original File Name: CMUA Comment.pdf

Date and Time Comment Was Submitted: 2022-10-27 09:02:46

No Duplicates.

## **Comment 4 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Nicole

Last Name: Waxman

Email Address: [nwaxman@bdlaw.com](mailto:nwaxman@bdlaw.com)

Affiliation:

Subject: Airlines for America's Comments on Proposed Advanced Clean Fleets Regulation  
Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/376-acf2022-BzUCNFJhAmMBKINi.pdf>

Original File Name: 2022-10-27 A4A Comments CARB Adv Clean Fleets Rule  
SUBMITTAL.pdf

Date and Time Comment Was Submitted: 2022-10-27 09:05:42

No Duplicates.

## **Comment 5 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Kye

Last Name: Whitmore

Email Address: kwhitmore@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Strengthening the Advanced Clean Flee rule, 7/8 trucks

Comment:

<p>I would like to submit a public comment calling for a strengthened fleet threshold for 7/8 trucks (tractor trucks), from 50 to 10. Given the disproportionate amount of released by tractor-trucks, it does not make sense for them to be managed on a 1/1 basis with other less polluting trucks like Class 2b trucks (as shown in the attached graph) This change would be critical to meet our State's public health and climate milestones and would add a significant benefit of reduced pollutants port and freight-adjacent communities. Thank you for your continued work on this issue.&nbsp;<br /><br /><br /></p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/377-acf2022-USRTNIAiU19SCwd0.pdf>

Original File Name: UCS\_ Strengthening the ACF.pdf

Date and Time Comment Was Submitted: 2022-10-27 09:18:31

No Duplicates.

## **Comment 6 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Will

Last Name: Garner

Email Address: wgarner@placer.ca.gov

Affiliation: Placer County Department of Public Works

Subject: Proposed Advanced Clean Fuels Regulation

Comment:

<p>Please see attached letter dated October 25, 2022 from Placer County Department of Public Works</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/378-acf2022-B3dWPFw8WGhSMQh6.pdf>

Original File Name: Placer Comment Letter on CARB ACF October 2022.pdf

Date and Time Comment Was Submitted: 2022-10-27 09:21:50

No Duplicates.

## **Comment 7 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Allen

Last Name: Schaeffer

Email Address: aschaeffer@dieselforum.org

Affiliation: Diesel Technology Forum

Subject: Advanced Clean Fleets Rule

Comment:

<p>Please consider the following comments and research.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/379-acf2022-VjJVOl05BydQMwdr.pdf>

Original File Name: Diesel Tech Forum Comments and Research on ACF\_Oct 2022.pdf

Date and Time Comment Was Submitted: 2022-10-27 09:10:49

No Duplicates.

## Comment 8 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)

First Name: Ileagh

Last Name: MacIvers

Email Address: ileagh@interfaithpowerandlight.org

Affiliation: Interfaith Power and Light

Subject: ACF Hearing Testimony

Comment:

```
<h1 dir="ltr" style="line-height: 1.44; margin-top: 24pt; margin-bottom: 0pt;"><span style="font-size: 16pt; font-family: Mulish,sans-serif; color: #1b1b1b; background-color: transparent; font-weight: bold; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Public Hearing to Consider Proposed Advanced Clean Fleets Regulation</span></h1>
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 10pt; font-family: Mulish,sans-serif; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Docket ID Numbers 22-14-1: Public Hearing to Consider Proposed Advanced Clean Fleets Regulation</span></p>
<p><strong id="docs-internal-guid-8ddb058d-7fff-bcd7-f597-0b5835c7fdcc" style="font-weight: normal;">&nbsp;</strong></p>
<p dir="ltr" style="line-height: 1.3800000000000001; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt; padding: 0pt 0pt 12pt 0pt;"><span style="font-size: 12pt; font-family: Mulish,sans-serif; color: #000000; background-color: transparent; font-weight: 500; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">October 27th, 2022</span></p>
<p dir="ltr" style="line-height: 1.3800000000000001; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt; padding: 0pt 0pt 12pt 0pt;"><span style="font-size: 12pt; font-family: Mulish, sans-serif; color: #000000; font-weight: 500; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">My name is Ileagh MacIvers and I am Interfaith Power & Light's Clean Cars Organizer. IPL's nonprofit mission is to inspire and mobilize people of faith and conscience to take bold and just action on climate change.&nbsp;</span></p>
<p dir="ltr" style="line-height: 1.3800000000000001; margin-top: 0pt; margin-bottom: 10pt;"><span style="font-size: 12pt; font-family: Mulish, sans-serif; color: #000000; font-weight: 500; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">I am here today to speak on behalf of my organization as well as Interfaith Power and Light affiliates in forty states that reach out to more than 22,000 congregations and millions of people of faith throughout our nation.&nbsp;</span></p>
<p dir="ltr" style="line-height: 1.3800000000000001; margin-top: 0pt; margin-bottom: 10pt;"><span style="font-size: 12pt; font-family: Mulish, sans-serif; color: #000000; font-weight: 500;
```

font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">I first want to thank the Air Resources Board for creating an alternative plan to bring electric trucks to our roads in a timely manner. Today, I am asking the board to adopt the Advanced Clean Fleet Accelerated ZEV Transition Alternative that will allow California to achieve 100% electric truck sales by 2036. Electric truck technology is here and strategies and funding are already in place to help meet these reasonable and gradual goals.

While trucks and buses account for a very small portion of vehicles on the road, they create about 25% of the climate pollution we experience in California. Heavy duty vehicles are the fastest growing source of climate emissions and truck miles traveled are projected to grow rapidly in the coming years. A loss of this rule, even in part, would create major negative implications for California's climate goals.

It would also affect the many other states that have adopted California's emissions limits and zero-emission targets for heavy-duty trucks.

We must also keep in mind that these rules target air pollution that disproportionately harms marginalized communities, such as communities of color and low-income communities, living near transportation infrastructure such as warehouses, ports and freeways. Immediate pollution reductions are a matter of environmental justice.

I

In addition, electrifying medium- and heavy-duty trucks will be key to improving air quality and saving lives in communities with some of the dirtiest air in the nation.

Almost every single Californian lives in an area impacted by poor air quality. Diesel exhaust contains more than 40 known cancer-causing organic substances, making it responsible for about 70% of cancer risk related to air toxins in California. It is the duty of the Air Resources Board to protect the health of all Californians from the detrimental impacts of air pollution.



margin-bottom: 0pt;"><span style="font-size: 12pt; font-family: Mulish, sans-serif; color: #000000; font-weight: 500; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">So again, on behalf of millions of people of faith and conscience around the country, I urge the Air Resources Board to approve the rule in full so California and other states across the country can reap the benefits of heavy duty vehicle electrification and accelerate the transition to zero emission vehicles.&nbsp;</span></p>  
<p><strong style="font-weight: normal;">&nbsp;</strong></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 12pt; font-family: Mulish, sans-serif; color: #000000; font-weight: 500; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Thank you for the opportunity to testify.&nbsp;</span></p>  
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt; padding: 12pt 0pt 12pt 0pt;"><span style="font-size: 12pt; font-family: Mulish, sans-serif; color: #000000; font-weight: 500; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Respectfully,&nbsp;</span></p>  
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 12pt; font-family: Mulish, sans-serif; color: #000000; font-weight: 500; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Ileagh MacIvers</span></p>  
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 12pt; font-family: Mulish, sans-serif; color: #000000; font-weight: 500; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Clean Cars Organizer, Interfaith Power & Light&nbsp;</span></p>  
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt; padding: 0pt 0pt 12pt 0pt;"><span style="font-size: 12pt; font-family: Mulish, sans-serif; color: #000000; font-weight: 500; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">ileagh@interfaithpowerandlight.org</span></p>  
<p><br /><br /></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 09:52:37

No Duplicates.

## **Comment 9 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Cassandra  
Last Name: Carmichael  
Email Address: cassandra@nrpe.org  
Affiliation: National Religious Partnership for Envir

Subject: Comment for Heavy Duty Truck Rule  
Comment:

<p>The National Religious Partnership for the Environment encompasses major national Christian and Jewish religious institutions coming together to work on environmental issues. Faith communities across the country have advocated to significantly reduce pollution and emissions from heavy duty trucks. Pollution from trucks has tragic impacts on human health, in particular communities of color. This is a result in part of discriminatory practices in highway and transportation depot sitings. Zero emission truck policies in California will have a positive effect on states throughout the country. For this reason, as we work to steward God's creation, the NRPE urges you to finalize a strong regulation that would move CA towards zero emission vehicles.</p>  
<p>&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 10:01:26

No Duplicates.

## **Comment 10 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Jeremy

Last Name: Smith

Email Address: jsmith@sbctc.org

Affiliation:

Subject: Proposed Advanced Clean Fleets Regulation (acf2022)

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/382-acf2022-UjFRNlwvBzYDWgNv.pdf>

Original File Name: CARB Letter 10-27-2022 v2 FINAL.pdf

Date and Time Comment Was Submitted: 2022-10-27 10:46:31

No Duplicates.

## **Comment 11 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Ann

Last Name: Amato

Email Address: annarden4@gmail.com

Affiliation: retired LCSW, member Sac Climate Coaliti

Subject: Please Adopt the Advanced Clean Fleet Accelerated Transition Alternative

Comment:

<p>I support CARB's alternative plan to bring electric trucks to the road faster and address the dangerous pollution that mostly effects communities of color in neighborhoods near highways and warehouses.</p>

<p>In addition, I urge CARB to move tractor trailers in priority fleets from 50 to 10 for class 7 & 8 tractor trailers to ensure CARB does NOT CREATE a GIANT LOOPHOLE INCENTIVE for trucking fleets to organize as sub-50 truck fleets to avoid compliance.</p>

<p>Our climate crisis necessitates 100% electric truck sales by 2036</p>

<p>&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 10:35:11

No Duplicates.

## **Comment 12 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Mikhael

Last Name: Skvarla

Email Address: mikhael\_skvarla@gualcogroup.com

Affiliation: California Hydrogen Coalition

Subject: California Hydrogen Coalition Comments on ACF  
Comment:

<p>Please see the attached letter. Thank you.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/384-acf2022-BmVRP1AyUFxXMAJh.pdf>

Original File Name: CHC ACF comments - Oct 2022 - Final.pdf

Date and Time Comment Was Submitted: 2022-10-27 10:50:26

No Duplicates.

## Comment 13 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)

First Name: Sam

Last Name: Wilson

Email Address: swilson@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Transcript of Verbal Comments on ACF - 10/27

Comment:

<p class="MsoNormal"><span style="font-size: 14.0pt; line-height: 107%;">Chair Randolph and members of the board, my name is Sam Wilson and I'm a Senior Vehicles Analyst with the Union of Concerned Scientists, a national nonprofit that puts rigorous science to work in our democracy. On behalf of our half-a million supporters, thank you for the opportunity to comment on this highly consequential regulation. </span></p>

<p class="MsoNormal"><span style="font-size: 14.0pt; line-height: 107%;">Thanks to CARB staff for their hard work and robust public process. The ACF is a crucial step in the right direction to reduce GHG emissions, help to relieve disproportionate health burdens on freight-adjacent communities and accelerate the market and tech for clean heavy-duty vehicles.</span></p>

<p class="MsoNormal"><span style="font-size: 14.0pt; line-height: 107%;">While we support this proposal, it does not adequately address the outsized impacts of tractor trucks. Big rig trucks are just around 10 percent of the state's medium and heavy-duty fleet but are responsible for about half of GHGs, NOx, and fine particulate emissions from HD vehicles. However, the compliance threshold under the rule is agnostic to the fact that different types of trucks and fleets contribute vastly different amounts of pollution. For example, a fleet of 50 tractor trucks emits around 14 times as much NOx, 4 times the fine particulates, and 4.5 times the GHG emissions as a fleet of 50 class 2b delivery vans.</span></p>

<p class="MsoNormal"><span style="font-size: 14.0pt; line-height: 107%;">Our analysis shows that a compliance threshold of 10 for tractors would best account for the significant pollution from these trucks &ndash; it would bring nearly 90 percent of tractor truck emissions under the rule, while only regulating around 10 percent of tractor fleets in the state AND leaving the most vulnerable small businesses outside the regulation. A lower threshold would also help to address the exclusion of certain tractor trucks under the drayage portion of the rule, which would allow combustion-powered auto transports and fuel delivery drayage trucks to operate nearly 20 years past the Governor's goal of 100 percent drayage operations by 2035.</span></p>

<p class="MsoNormal"><span style="font-size: 14.0pt; line-height: 107%;">Finally, other 177 states have signaled their intent to adopt a dynamic threshold by establishing fleet reporting thresholds of 5. </span></p><p>&nbsp;</p>

<p class="MsoNormal"><span style="font-size: 14.0pt; line-height: 107%;">A dynamic compliance threshold that recognizes the outsized impacts of the dirtiest trucks would supercharge the benefits ACF is poised to deliver. Thank you.</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 10:57:35

No Duplicates.

## **Comment 14 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Nancy

Last Name: Kruger

Email Address: nkruger@4cleanair.org

Affiliation: Nat'l Assoc. of Clean Air Agencies-NACAA

Subject: Proposed ACF Regulation

Comment:

<p style="margin: 0px 0em 0.9em;">Dear Chair Randolph and Honorable Members of the California Air Resources Board,</p>

<p style="margin: 0.7em 0em 0.9em;">The National Association of Clean Air Agencies (NACAA) is pleased to provide the attached comments in support of CARB's proposed Advanced Clean Fleets rule.&nbsp; Tracy Babbidge, Co-Chair of the NACAA Mobile Sources and Fuels Committee, will also speak at today's (October 27, 2022) public hearing.</p>

<p style="margin: 0.7em 0em 0.9em;">Thank you,</p>

<p style="margin: 0.7em 0em 0.9em;">-Nancy Kruger, NACAA Deputy Director</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/387-acf2022-WjRcOVU1V2VRCAhr.pdf>

Original File Name: NCAA Comment.pdf

Date and Time Comment Was Submitted: 2022-10-27 11:20:27

No Duplicates.



## Comment 15 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)

First Name: Suzanne

Last Name: Seivright-Sutherland

Email Address: sseivright@calcima.org

Affiliation: CalCIMA

Subject: CalCIMA comments - ARB ACF high priority and federal fleets and LER

Comment:

I'm Suzanne Seivright-Sutherland from the California Construction and Industrial Materials Association, better known as CalCIMA, the statewide trade association for producers of aggregate, concrete, cement, asphalt, and industrial minerals used to build our state's infrastructure.

In coordination with Jeffer Mangels Butler & Mitchell, CalCIMA submitted a comment letter proposing specific revisions to the regulatory language consistent with its goals to address the deficiencies and to help ensure the construction materials producers can implement this Regulation. Some key points from our letter include the following:

1) To ensure consistent and practical application, we ask for accurate and precise definitions for the terms "available to purchase", "commercially available," and "configuration."

2) Because the ZEV Unavailability Exemption simply assumes the future availability of pickup trucks in all configurations, we ask that pickup trucks be addressed the same as the Regulation addresses trucks over 14,000 pounds GVWR.

3) For fleets whom a transition to hydrogen fuel cell is the logical operational endpoint, and for whom a requirement to purchase battery electric vehicles to achieve short-term compliance will force a double investment, we ask for an alternative compliance pathway.

4) Because CARB inconsistently categorizes ready-mix concrete trucks in various locations and



## **Comment 16 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: East

Last Name: Peterson-Trujillo

Email Address: ept@citizen.org

Affiliation: Public Citizen

Subject: Public Citizen Testimony on ACF Proposed Rules

Comment:

<p>Given the 90 second time limit on verbal comments, please see full comments that were intended to presented verbally, attached.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/389-acf2022-ViZUMQMvUmBQNQZg.pdf>

Original File Name: PC-ACF-Testimony-10\_27.pdf

Date and Time Comment Was Submitted: 2022-10-27 11:25:08

No Duplicates.

**Comment 17 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Derrick

Last Name: Robinson

Email Address: [derrick@cpisandiego.org](mailto:derrick@cpisandiego.org)

Affiliation:

Subject: Support CARB ACF Alternatives with provisions.

Comment:

Dear Chair Randolph and California Air Resources Board Members,

On behalf of the Center on Policy Initiatives, we urge the California Air Resources Board (CARB) to direct Staff to strengthen the proposed Advanced Clean Fleets (ACF) rule before final adoption. This can be accomplished by directing Staff to propose for final adoption the three recommendations below, included in Alternative 2: Accelerated ZEV Transition, as presented in the Initial Statement of Reasons (ISOR). This includes:

1. Moving the 100 percent MHD ZEV sales date from 2040 to 2036; and

2. Ensuring all Class 7 and 8 tractors are subject to the same transition schedule beginning 2027 while lowering the High Priority Fleet threshold for Class 7 and 8 tractors from 10 or more trucks.

As you know, diesel trucks are one of the fastest-growing sources of greenhouse gas (GHG) emissions,[<a href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftn1" title="">](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftn1)

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name="\_ftnref1"><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: Calibri; font-size: 11pt;">As you know, diesel trucks are one of the fastest-growing sources of greenhouse gas (GHG) emissions,As you know, diesel trucks are one of the fastest-growing sources of greenhouse gas (GHG) emissions,

'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA; ">[1]</span></span><!--[endif]--></span></span></a> a dominant source of California's nitrogen oxide (NOx) pollution,<a style="mso-footnote-id: ftn2;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn2" name="\_ftnref2"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA; ">[2]</span></span><!--[endif]--></span></span></a> and the largest source of air pollution disparity in the United States.<a style="mso-footnote-id: ftn3;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn3" name="\_ftnref3"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA; ">[3]</span></span><!--[endif]--></span></span></a> Without immediate action, the freight industry's rapid growth means pollution burdens will worsen, especially for low-income communities and communities of color in California due to longstanding injustices that disproportionately located freight routes in those communities.<a style="mso-footnote-id: ftn4;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn4" name="\_ftnref4"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA; ">[4]</span></span><!--[endif]--></span></span></a> In addition, parts of the trucking industry contain pervasive and extreme worker exploitation, often linked directly to environmental noncompliance.<a style="mso-footnote-id: ftn5;" title=""

href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn5" name="\_ftnref5"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[5]</span></span><!--[endif]--></span></span></a> CARB's efforts to regulate controlling entities rather than drivers are, therefore, critical and must be expanded to cover more fleets.</p><p class="MsoNormal" style="line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">The ACF rule is vital to addressing California's air quality, climate, and environmental justice crises by requiring a portion of medium- and heavy-duty (MHD) vehicle fleets to transition to zero-emission vehicles (ZEVs).</span> Commenters commend CARB Staff on including Alternative 2, which clearly shows the cost-effectiveness of much greater emissions reductions. But <span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">Staff's rejection of this alternative is not reasonable. The generalized concerns outlined in the ISOR and expressed by some stakeholders do not justify foregoing the massive benefits of Alternative 2 in favor of a</span> proposal that falls short of achieving the goals in Governor Newsom's EO N-79-20<a style="mso-footnote-id: ftn6;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn6" name="\_ftnref6"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[6]</span></span><!--[endif]--></span></span></a> and CARB's 2020 Mobile Source Strategy<a style="mso-footnote-id: ftn7;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn7" name="\_ftnref7"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin;

mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi;  
mso-ansi-language: EN-US; mso-fareast-language: EN-US;  
mso-bidi-language:  
AR-SA; ">[7]</span></span><!--[endif]--></span></span></a> and would  
leave about half of the truck population combustion powered by  
2045, imperiling air quality and public health throughout the  
state.<a style="mso-footnote-id: ftn8;" title=""  
href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Con  
tent.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-  
20221%20(Updated).docx#\_ftn8"  
name="\_ftnref8"><span class="MsoFootnoteReference"><span  
style="mso-special-character: footnote;"><!-- [if  
!supportFootnotes]--><span class="MsoFootnoteReference"><span  
style="font-size: 11.0pt; line-height: 107%; font-family:  
'Calibri', sans-serif; mso-ascii-theme-font: minor-latin;  
mso-fareast-font-family: Calibri; mso-fareast-theme-font:  
minor-latin; mso-hansi-theme-font: minor-latin;  
mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi;  
mso-ansi-language: EN-US; mso-fareast-language: EN-US;  
mso-bidi-language:  
AR-SA; ">[8]</span></span><!--[endif]--></span></span></a></p>  
<p class="MsoNormal" style="line-height: normal;">Strengthening the  
ACF rule is a technically feasible and cost-effective opportunity  
for CARB to move the state closer to meeting the clean air and  
climate objectives while encouraging high-road jobs across the  
supply chain and economic justice for incumbent truck drivers.<a  
style="mso-footnote-id: ftn9;" title=""  
href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Con  
tent.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-  
20221%20(Updated).docx#\_ftn9"  
name="\_ftnref9"><span class="MsoFootnoteReference"><span  
style="mso-special-character: footnote;"><!-- [if  
!supportFootnotes]--><span class="MsoFootnoteReference"><span  
style="font-size: 11.0pt; line-height: 107%; font-family:  
'Calibri', sans-serif; mso-ascii-theme-font: minor-latin;  
mso-fareast-font-family: Calibri; mso-fareast-theme-font:  
minor-latin; mso-hansi-theme-font: minor-latin;  
mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi;  
mso-ansi-language: EN-US; mso-fareast-language: EN-US;  
mso-bidi-language:  
AR-SA; ">[9]</span></span><!--[endif]--></span></span></a> As shown  
in the figures below, Alternative 2 would put 230,000 more ZEVs on  
the road by 2050, leading to significant emission reductions  
compared to Staff's proposal <span  
style="mso-ascii-font-family: Calibri; mso-fareast-font-family:  
Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family:  
Calibri; color: black; mso-themecolor: text1;">and additional  
economic benefits for fleets</span>.</p>  
<p class="MsoNormal" style="text-align: center; line-height:  
normal;" align="center">&nbsp;</p>  
<p class="MsoNormal" style="line-height: normal;"><em>Source:  
Advanced Clean Fleet Rule, Initial Statement of Reasons</em></p>  
<p class="MsoNormal" style="line-height: normal;">These comments  
explain the necessary revisions to the current ACF rule proposal,  
contained in Alternative 2, to better align with California's  
targets and the benefits and feasibility of doing so. These  
comments also respond to the arguments for not recommending the  
stronger alternative despite its feasibility and clear benefits.  
Staff's overly conservative "balance" runs  
counter to the facts on the ground — from the rapid adoption  
of MHD ZEVs and historic federal investments in electrification to  
the accelerating climate tragedies and continued examples of

failing state air plans &ndash; all of which show more is possible and necessary. Incorporating our recommendations will deeply and positively impact public health, workers, and the economy.</p>  
<h2 style="margin-bottom: 8.0pt;">Adopt Alternative 2: Accelerated ZEV Transition<a style="mso-footnote-id: ftn10;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn10" name="\_ftnref10"><span class="MsoFootnoteReference"><span style="font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; color: black; mso-themecolor: text1;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 13.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; color: black; mso-themecolor: text1; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[10]</span></span><!--[endif]--></span></span></span></a></h2>  
<p class="MsoNormal" style="line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">Adopting Alternative 2 will lead to significantly more emissions reductions,<a style="mso-footnote-id: ftn11;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn11" name="\_ftnref11"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; color: black; mso-themecolor: text1; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[11]</span></span><!--[endif]--></span></span></a> public health benefits,<a style="mso-footnote-id: ftn12;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn12" name="\_ftnref12"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; color: black; mso-themecolor: text1; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[12]</span></span><!--[endif]--></span></span></a> benefits to workers, cost savings to fleets, and ZEVs on the road than the current ACF proposal.<a style="mso-footnote-id: ftn13;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn13" name="\_ftnref13"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; color: black; mso-themecolor: text1; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[13]</span></span><!--[endif]--></span></span></a> The Board should direct Staff to incorporate the following changes into the final rule:</span></p>



**Urgent Action is Needed**

The communities across California suffering from freight pollution need Alternative 2's emission reductions now. The state is failing to meet National Ambient Air Quality Standards in the most polluted air basins in the nation

Commenters commend CARB for the strong standards incorporated for drayage and state and local government fleets.

Lowering the High Priority Fleet threshold for Class 7 and 8 tractors from 50 to 10 trucks.

Moving Class 8 Sleeper Cabs from Group 3 to Group 2 vehicles in the High Priority Fleets Rule so that all Class 7 and 8 tractors are subject to the same transition schedule beginning 2027 (instead of 2030); and

Further reduce emissions from highly emitting Class 7 and 8 tractors by:

2.

Move the 100 percent MHD ZEV sales date from 2040 to 2036.

!supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[14]</span></span><!--[endif]--></span></span></a> and is on track to miss its 2045 climate targets. According to the American Lung Association, California cities consistently have the worst air pollution in the country for ozone and particulate matter.<a style="mso-footnote-id: ftn15;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn15" name="\_ftnref15"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[15]</span></span><!--[endif]--></span></span></a> Meanwhile, emissions from freight are rising,<a style="mso-footnote-id: ftn16;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn16" name="\_ftnref16"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[16]</span></span><!--[endif]--></span></span></a> and new warehouses and logistics centers continue rapidly devouring the land and polluting the air around low-income communities of color.<a style="mso-footnote-id: ftn17;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn17" name="\_ftnref17"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[17]</span></span><!--[endif]--></span></span></a></span></p><p class="MsoNormal" style="margin-bottom: 0in; margin-top: 0in; mso-margin-bottom-alt: 8.0pt; mso-margin-top-alt: 0in; mso-add-space: auto; line-height: normal;">&nbsp;</p><p class="MsoNormal" style="margin-bottom: 0in; margin-top: 0in; mso-margin-bottom-alt: 8.0pt; mso-margin-top-alt: 0in; mso-add-space: auto; line-height: normal;"><em><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri;">Source: Robert Redford Conservancy</span></em></p><p class="MsoNormal" style="margin-bottom: 0in; margin-top: 0in; mso-margin-bottom-alt: 8.0pt; mso-margin-top-alt: 0in; mso-add-space: auto; line-height: normal;"><em><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family:

Calibri;">&nbsp;</span></em></p>  
<p class="MsoNormal" style="margin-bottom: 0in; margin-top: 0in; mso-margin-bottom-alt: 8.0pt; mso-margin-top-alt: 0in; mso-add-space: auto; line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri;">The above graphics show the distribution of warehouses in Riverside and San Bernardino Counties and the growth of warehouses over the last 40 years.<a style="mso-footnote-id: ftn18;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn18" name="\_ftnref18"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[18]</span></span><!--[endif]--></span></span></a> Research shows a direct correlation between these warehouses and higher fine particulates (PM2.5) levels in the surrounding communities. Compared to other census tracts, the land near warehouses tends to have less value, more air and noise pollution, and residents that are lower income and majority Hispanic.<a style="mso-footnote-id: ftn19;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn19" name="\_ftnref19"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[19]</span></span><!--[endif]--></span></span></a> The rapid growth of warehouses in California, and the truck traffic they attract, have significant environmental justice implications and must be addressed.</span></p>  
<p class="MsoNormal" style="margin-bottom: 0in; margin-top: 0in; mso-margin-bottom-alt: 8.0pt; mso-margin-top-alt: 0in; mso-add-space: auto; line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri;">&nbsp;</span></p>  
<p class="MsoNormal" style="margin-bottom: 8.0pt; mso-margin-bottom-alt: 8.0pt; mso-margin-top-alt: 0in; mso-add-space: auto; line-height: normal;">Advancing the 100 percent sales requirement to 2036 and addressing the impacts of the highest polluting vehicles will provide earlier and larger reductions in NOx, PM2.5, and GHGs, and avoid thousands more additional deaths and hospitalizations than the current proposal. Staff's conservative estimate, which excludes recent federal incentives, is that Alternative 2 would produce an additional \$10 billion net benefit savings (a 21 percent increase over the proposed alternative).<a style="mso-footnote-id: ftn20;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn20" name="\_ftnref20"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if

!supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[20]</span></span><!--[endif]--></span></span></a>

Alternative 2's comparative benefits include the following:

• Over \$34 billion in additional health benefits;

• An additional 60 percent reduction in NOx and PM2.5 emissions;

• A 54 percent greater reduction in GHG emissions;

• A 2 percent increase in net cost savings to fleet owners;

• An additional 230,000 MHD ZEVs on the road by 2050; and

• Avoiding over 3,000 additional premature deaths.

<a style="mso-footnote-id: ftn21;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn21">

name="\_ftnref21"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[21]</span></span><!--[endif]--></span></span></a></p><p class="MsoNormal"><span style="mso-spacerun: yes;">&nbsp;</span></p><table class="MsoTable15Grid5DarkAccent1" style="width: 467.5pt; border-collapse: collapse; border: none; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; mso-yfti-tbllook: 1696; mso-padding-alt: 0in 5.4pt 0in 5.4pt;" border="1" width="623" cellspacing="0" cellpadding="0"><tbody><tr style="mso-yfti-irow: -1; mso-yfti-firstrow: yes; mso-yfti-lastfirstrow: yes; height: 14.25pt;"><td style="width: 467.5pt; border: solid white 1.0pt; mso-border-themecolor: background1; mso-border-alt: solid white .5pt; background: #4472C4; mso-background-themecolor: accent1; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" colspan="5" valign="top" width="623"><p class="MsoNormal" style="margin-bottom: 8.0pt; text-align: center; line-height: normal; mso-yfti-cnfc: 5;" align="center"><strong><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;">Cumulative Benefits by 2050</span></strong></p></td></tr><tr style="mso-yfti-irow: 0; height: 15.0pt;"><td style="width: 93.5pt; border: solid white 1.0pt; mso-border-themecolor: background1; border-top: none; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-alt: solid white .5pt; background: #4472C4; mso-background-themecolor: accent1; padding: 0in 5.4pt 0in 5.4pt; height: 15.0pt;" valign="top" width="125"><p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal; mso-yfti-cnfc: 4;"><strong><span style="color: white; mso-themecolor: background1;">&nbsp;</span></strong></p></td><td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 15.0pt;" valign="top" width="125"><p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">Proposal</span></p></td></tr></tbody></table>

<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;">&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;Alternative 2&lt;/span&gt;&lt;/p&gt; </p>	<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;">&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;Difference&lt;/span&gt;&lt;/p&gt; </p>	<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;">&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;% Difference&lt;/span&gt;&lt;/p&gt; </p>		

mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;">Cost Savings</span></strong></p>  
</td>  
</tr>  
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<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal; mso-yfti-cnfc: 4;"><strong><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;">Net Fleet Cost Savings (\$billions)</span></strong></p>  
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<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">\$22.1 </span></p>  
</td>  
<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 15.0pt;" valign="top" width="125">  
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<p style="margin-bottom: 8.0pt; line-height: normal;"> <span style="font-family: Calibri; font-size: 10pt;">mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;&gt;2%&lt;/span&gt;&lt;/p&gt;</span> </p>	<p style="margin-bottom: 8.0pt; line-height: normal;"> <span style="font-family: Calibri; font-size: 10pt;">mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;&gt;2%&lt;/span&gt;&lt;/p&gt;</span> </p>
<p style="margin-bottom: 8.0pt; line-height: normal;"> <span style="font-family: Calibri; font-size: 10pt;">mso-yfti-cnfc: 4;"&gt;&lt;strong&gt;&lt;span style="font-family: Calibri; font-size: 10pt;"&gt;mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;"&gt;Health Benefit Savings (\$billions)&lt;/span&gt;&lt;/strong&gt;&lt;/p&gt;</span> </p>	<p style="margin-bottom: 8.0pt; line-height: normal;"> <span style="font-family: Calibri; font-size: 10pt;">mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;&gt;\$57.8 &lt;/span&gt;&lt;/p&gt;</span> </p>
<p style="margin-bottom: 8.0pt; line-height: normal;"> <span style="font-family: Calibri; font-size: 10pt;">mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;&gt;\$57.8 &lt;/span&gt;&lt;/p&gt;</span> </p>	<p style="margin-bottom: 8.0pt; line-height: normal;"> <span style="font-family: Calibri; font-size: 10pt;">mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;&gt;\$57.8 &lt;/span&gt;&lt;/p&gt;</span> </p>



<p>mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125"&gt;</p> <p>&lt;p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"&gt;&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;&lt;span style="mso-spacerun: yes;"&gt;&amp;nbsp;&lt;/span&gt;\$92.1&lt;/span&gt;&lt;/p&gt;</p>	<p>&lt;td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125"&gt;</p> <p>&lt;p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"&gt;&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;&lt;span style="mso-spacerun: yes;"&gt;&amp;nbsp;&lt;/span&gt;\$34.3&lt;/span&gt;&lt;/p&gt;</p>
<p>&lt;/td&gt;</p>	<p>&lt;td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125"&gt;</p> <p>&lt;p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"&gt;&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;59%&lt;/span&gt;&lt;/p&gt;</p>

<p>&lt;/tr&gt;</p>	<p>&lt;tr style="mso-yfti-irow: 4; height: 14.25pt;"&gt;</p>
<p>&lt;td style="width: 93.5pt; border: solid white 1.0pt; mso-border-themecolor: background1; border-top: none; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-alt: solid white .5pt; background: #4472C4; mso-background-themecolor: accent1; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125"&gt;</p> <p>&lt;p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal; mso-yfti-cnfc: 4;"&gt;&lt;strong&gt;&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family:</p>	<p>&lt;td style="width: 93.5pt; border: solid white 1.0pt; mso-border-themecolor: background1; border-top: none; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-alt: solid white .5pt; background: #4472C4; mso-background-themecolor: accent1; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125"&gt;</p> <p>&lt;p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal; mso-yfti-cnfc: 4;"&gt;&lt;strong&gt;&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family:</p>

Calibri; color: white; mso-themecolor: background1;">Net Benefit Savings\* (\$billions)</span></strong></p>  
</td>  
<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">  
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</td>  
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</td>  
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</td>

</tr>

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<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal; mso-yfti-cnfc: 4;"><strong><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;">Social Cost of Carbon Reductions (\$billions) at 3% discount rate</span></strong></p>

</td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 45.75pt;" valign="top" width="125">

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</td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 45.75pt;" valign="top" width="125">

<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"><span style="mso-spacerun: yes;">&nbsp;</span>\$37.4</span></p>

</td>

<p> <td &gt;="" <p="" class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;" valign="top" width="125">&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;&lt;span style="mso-spacerun: yes;"&gt;&amp;nbsp;&lt;/span&gt;\$11.4&lt;/span&gt;&lt;/p&gt; &lt;/td&gt; <td &gt;="" <p="" class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;" valign="top" width="125">&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;44%&lt;/span&gt;&lt;/p&gt; &lt;/td&gt; </td></td></p>	<span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"><span style="mso-spacerun: yes;">&nbsp;</span>\$11.4</span></p> </td> <td &gt;="" <p="" class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;" valign="top" width="125">&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;44%&lt;/span&gt;&lt;/p&gt; &lt;/td&gt; </td>	<span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">44%</span></p> </td>										
<p> <td &gt;="" &gt;&lt;strong&gt;&lt;span="" &gt;emissions="" &lt;="" <="" <p="" align="center" class="MsoNormal" colspan="5" p&gt;="" reductions&lt;="" span&gt;&lt;="" strong&gt;&lt;="" style="color: white; mso-themecolor: background1;" td&gt;="" tr="" width="623"> <tr> <td colspan="5"> <p> <td &gt;="" &gt;&lt;strong&gt;&lt;span="" &gt;nox="" (tons)&lt;="" <="" <p="" class="MsoNormal" p&gt;="" reductions="" span&gt;&lt;="" strong&gt;&lt;="" style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;" td="" valign="top" width="125"> </td></p></td></tr> </td></p>		<tr> <td colspan="5"> <p> <td &gt;="" &gt;&lt;strong&gt;&lt;span="" &gt;nox="" (tons)&lt;="" <="" <p="" class="MsoNormal" p&gt;="" reductions="" span&gt;&lt;="" strong&gt;&lt;="" style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;" td="" valign="top" width="125"> </td></p></td></tr>					<p> <td &gt;="" &gt;&lt;strong&gt;&lt;span="" &gt;nox="" (tons)&lt;="" <="" <p="" class="MsoNormal" p&gt;="" reductions="" span&gt;&lt;="" strong&gt;&lt;="" style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;" td="" valign="top" width="125"> </td></p>					
<p> <td &gt;="" &gt;&lt;strong&gt;&lt;span="" &gt;nox="" (tons)&lt;="" <="" <p="" class="MsoNormal" p&gt;="" reductions="" span&gt;&lt;="" strong&gt;&lt;="" style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;" td="" valign="top" width="125"> </td></p>												

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</td>
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background1; border-right: solid white 1.0pt;
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white .5pt; mso-border-top-themecolor: background1;
mso-border-left-alt: solid white .5pt; mso-border-left-themecolor:
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mso-background-themecolor: accent1; mso-background-themetint: 51;
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mso-bidi-font-family: Calibri; color: black; mso-themecolor:
text1;">418,938</span></p>
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white .5pt; mso-border-top-themecolor: background1;
mso-border-left-alt: solid white .5pt; mso-border-left-themecolor:
background1; mso-border-alt: solid white .5pt;
mso-border-themecolor: background1; background: #D9E2F3;
mso-background-themecolor: accent1; mso-background-themetint: 51;
padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top"
width="125">
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text1;">673,970</span></p>
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white .5pt; mso-border-top-themecolor: background1;
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mso-background-themecolor: accent1; mso-background-themetint: 51;
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width="125">
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normal;"><span style="mso-ascii-font-family: Calibri;
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text1;">255,032</span></p>
</td>
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background1; border-right: solid white 1.0pt;
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white .5pt; mso-border-top-themecolor: background1;
mso-border-left-alt: solid white .5pt; mso-border-left-themecolor:
background1; mso-border-alt: solid white .5pt;
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mso-background-themecolor: accent1; mso-background-themetint: 51;
padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top"
width="125">

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width="125">

<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">61%</span></p>

</td>

</tr>

<tr style="mso-yfti-irow: 8; height: 14.25pt;">

<td style="width: 93.5pt; border: solid white 1.0pt; mso-border-themecolor: background1; border-top: none; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-alt: solid white .5pt; background: #4472C4; mso-background-themecolor: accent1; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal; mso-yfti-cnfc: 4;"><strong><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;">PM 2.5 Reductions (tons)</span></strong></p>

</td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

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</td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

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</td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

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</td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

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</td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

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background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

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</td>

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</td>

</tr>

<tr style="mso-yfti-irow: 9; height: 14.25pt;">

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<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal; mso-yfti-cnfc: 4;"><strong><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;">GHG Reductions (MMT CO2e)</span></strong></p>

</td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

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</td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor:

<p>background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125"&gt;</p> <p>&lt;p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"&gt;&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;472&lt;/span&gt;&lt;/p&gt;</p>	<p>&lt;td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125"&gt;</p> <p>&lt;p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"&gt;&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;165&lt;/span&gt;&lt;/p&gt;</p>	<p>&lt;td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125"&gt;</p> <p>&lt;p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"&gt;&lt;span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"&gt;54%&lt;/span&gt;&lt;/p&gt;</p>
<p>&lt;tr style="mso-yfti-irow: 10; height: 14.25pt;"&gt;</p>		
<p>&lt;td style="width: 467.5pt; border: solid white 1.0pt; mso-border-themecolor: background1; border-top: none; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-alt: solid white .5pt; background: #4472C4; mso-background-themecolor: accent1; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" colspan="5" width="623"&gt;</p> <p>&lt;p class="MsoNormal" style="margin-bottom: 8.0pt; text-align: center; line-height: normal; mso-yfti-cnfc: 4;" align="center"&gt;&lt;strong&gt;&lt;span style="color: white; mso-themecolor: background1;"&gt;Public Health Benefits&lt;/span&gt;&lt;/strong&gt;&lt;/p&gt;</p>		



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</tr>
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mso-background-themecolor: accent1; padding: 0in 5.4pt 0in 5.4pt;
height: 14.25pt;" valign="top" width="125">
<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height:
normal; mso-yfti-cnfc: 4;"><strong><span
style="mso-ascii-font-family: Calibri; mso-fareast-font-family:
Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family:
Calibri; color: white; mso-themecolor: background1;">Avoided Cardio
Pulmonary Deaths</span></strong></p>
</td>
<td style="width: 93.5pt; border-top: none; border-left: none;
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background1; border-right: solid white 1.0pt;
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white .5pt; mso-border-top-themecolor: background1;
mso-border-left-alt: solid white .5pt; mso-border-left-themecolor:
background1; mso-border-alt: solid white .5pt;
mso-border-themecolor: background1; background: #D9E2F3;
mso-background-themecolor: accent1; mso-background-themetint: 51;
padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top"
width="125">
<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height:
normal;"><span style="mso-ascii-font-family: Calibri;
mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri;
mso-bidi-font-family: Calibri; color: black; mso-themecolor:
text1;">5,517</span></p>
</td>
<td style="width: 93.5pt; border-top: none; border-left: none;
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background1; border-right: solid white 1.0pt;
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white .5pt; mso-border-top-themecolor: background1;
mso-border-left-alt: solid white .5pt; mso-border-left-themecolor:
background1; mso-border-alt: solid white .5pt;
mso-border-themecolor: background1; background: #D9E2F3;
mso-background-themecolor: accent1; mso-background-themetint: 51;
padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top"
width="125">
<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height:
normal;"><span style="mso-ascii-font-family: Calibri;
mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri;
mso-bidi-font-family: Calibri; color: black; mso-themecolor:
text1;">8,791</span></p>
</td>
<td style="width: 93.5pt; border-top: none; border-left: none;
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background1; border-right: solid white 1.0pt;
mso-border-right-themecolor: background1; mso-border-top-alt: solid
white .5pt; mso-border-top-themecolor: background1;
mso-border-left-alt: solid white .5pt; mso-border-left-themecolor:
background1; mso-border-alt: solid white .5pt;
mso-border-themecolor: background1; background: #D9E2F3;
mso-background-themecolor: accent1; mso-background-themetint: 51;
padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top"
width="125">
<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height:
normal;"><span style="mso-ascii-font-family: Calibri;

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mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1; ">3,274</span></p></td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">59%</span></p></td>

</tr>

<tr style="mso-yfti-irow: 12; height: 14.25pt;">

<td style="width: 93.5pt; border: solid white 1.0pt; mso-border-themecolor: background1; border-top: none; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-alt: solid white .5pt; background: #4472C4; mso-background-themecolor: accent1; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal; mso-yfti-cnfc: 4;"><strong><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: white; mso-themecolor: background1;">Avoided ER Admits for Asthma</span></strong></p></td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

<p class="MsoNormal" style="margin-bottom: 8.0pt; line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">2,537</span></p></td>

<td style="width: 93.5pt; border-top: none; border-left: none; border-bottom: solid white 1.0pt; mso-border-bottom-themecolor: background1; border-right: solid white 1.0pt; mso-border-right-themecolor: background1; mso-border-top-alt: solid white .5pt; mso-border-top-themecolor: background1; mso-border-left-alt: solid white .5pt; mso-border-left-themecolor: background1; mso-border-alt: solid white .5pt; mso-border-themecolor: background1; background: #D9E2F3; mso-background-themecolor: accent1; mso-background-themetint: 51;

padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;" valign="top" width="125">

4,056

1,519

60%

60%

60%

<div style="border: 1pt solid white; background-color: #4472C4; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;"></div>	<div style="border: 1pt solid white; background-color: #4472C4; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;"></div>
--	--

<div style="border: 1pt solid white; background-color: #4472C4; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;"></div>	<div style="border: 1pt solid white; background-color: #4472C4; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;"></div>
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<div style="border: 1pt solid white; background-color: #4472C4; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;"></div>	<div style="border: 1pt solid white; background-color: #4472C4; padding: 0in 5.4pt 0in 5.4pt; height: 14.25pt;"></div>
--	--

height: 14.25pt;" valign="top" width="125">

**Increased ZEVs**

1,580,000

1,810,000

230,000

>15%	

\*Includes costs, savings, health benefits, and tax/fee reductions

Source: Selected data from the Advanced Clean Fleets Rule, Initial Statement of Reasons

## 

-- [if !supportLists]--<span style="font-family: 'Calibri Light'; font-size: 7pt;">1.       

Accelerating the 100 percent ZEV sales requirement to 2036 instead of 2040 is necessary and feasible. The change will bring us closer to achieving the Governor's Executive Order and the Board Resolution requiring all on-road MHDVs to be zero-emission by 2045. Additionally, reporting suggests Environmental Protection Agency (EPA) plans to issue a supplemental proposal this December for the agency's proposed pollution standards for MHDV model years 2027-2029 to consider the impacts of the Inflation Reduction Act (IRA) and the extensive information already in the record on the need for and feasibility of MHD ZEV deployment. It is critical for EPA to swiftly finalize these standards, and strengthening the ACF rule will accelerate ZEV deployment and create a strong foundation for the federal government to move forward with protective emissions standards.

All new MHDV sales being zero-emission by 2036 helps mitigate the risk of

misalignment between supply and demand and permits CARB to set stronger fleet purchase requirements. Without this change, a recent analysis demonstrates that MHD ZEV sales in California could decline after 2035.

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftn22](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftn22)

If the 100 percent sales target remains at 2040 and fleet requirements are met, it will cause manufacturers to over comply with the ACT rule leading to an accumulation of unused credits by 2035 when the sales requirements all plateau. Original equipment manufacturers (OEMs) will have a choice: continue increasing ZEV sales volumes or retire credits for compliance. Should they choose the latter, it could suppress ZEV sales between 2036 and 2039, causing over 170,000 fewer MHD ZEV sales.

Even when only considering accelerating the sales requirement to 2036, cumulative net societal benefits are projected to jump \$9.9 billion by 2050 due to improved air quality, reduced GHGs, higher utility net revenue, and fleet savings. This four-year change would reduce cumulative emissions through 2050 of GHGs by 24 million metric tons (MT), NOx by over 30,000 MT, and PM2.5 by 1,040 MT.

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftn23](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftn23)

Moving the 100 percent MHD ZEV sales requirement to 2036 better reflects the pace of technological and market advancements while sending a clear signal that will prime the investment pump for deployment at scale.

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftn24](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftn24)

>[24]</span></span><!--[endif]--></span></span></a></span>  
<span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri;">I</span>ncluded as Attachment A is an annotated list of resources supporting <span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri;">the feasibility of 100 percent MHD ZEVs by 2036.</span>  
It is important to note that Staff, for their part, has not argued that moving the 100 percent target from 2040 to 2036 would be infeasible. Their arguments against Alternative 2 focus on expanded fleet coverage, not manufacturer capacity to increase sales.</p>  
<p class="MsoNormal" style="line-height: normal;">T<span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">he manufacturing and infrastructure capacity to support an earlier new sales target is underway and accelerating. Despite Volvo's opposition to strong CARB rules, Roger Alms, head of Volvo Trucks, recently explained that "the shift to electric is happening a lot faster than people think" and predicted that 70 percent of Volvo's truck sales in Europe, which has strict rules, will be full battery electric by 2030.<a style="mso-footnote-id: ftn25;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn25" name="\_ftnref25"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-fareast-font-family: Calibri; color: black; mso-themecolor: text1; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[25]</span></span><!--[endif]--></span></span></a>  
Significant private investment is occurring in the US to build out a national network of chargers (more details below)<a style="mso-footnote-id: ftn26;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn26" name="\_ftnref26"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-fareast-font-family: Calibri; color: black; mso-themecolor: text1; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[26]</span></span><!--[endif]--></span></span></a> while manufacturers continue to advance the production of MHD ZEVs.<a style="mso-footnote-id: ftn27;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn27" name="\_ftnref27"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family:

'Calibri',sans-serif; mso-fareast-font-family: Calibri; color: black; mso-themecolor: text1; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA; ">[27]</span></span><!--[endif]--></span></span></a></span><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri;"> Legacy and new entrant OEMs operate or are constructing manufacturing plants, assembly lines, and battery factories to deliver an increasing supply of ZEVs. For example, Statevolt is building a \$4 billion EV battery gigafactory with a 54 GWh output, supporting the buildout of about 650,000 ZEVs in Southern California.<a style="mso-footnote-id: ftn28;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn28" name="\_ftnref28"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[28]</span></span><!--[endif]--></span></span></a> Tesla is expanding its Fremont battery facility,<a style="mso-footnote-id: ftn29;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn29" name="\_ftnref29"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[29]</span></span><!--[endif]--></span></span></a> and the US is expected to more than double its battery production capacity by 2025.<a style="mso-footnote-id: ftn30;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn30" name="\_ftnref30"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[30]</span></span><!--[endif]--></span></span></a> Meanwhile, billions of dollars in the form of grants and loans are also pouring in from the f</span>ederal government thanks to the recent Infrastructure Investment and Jobs Act (IIJA) and IRA that will further boost domestic ZEV production<span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">.</span><a style="mso-footnote-id: ftn31;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn31" name="\_ftnref31"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if



!supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[31]</span></span><!--[endif]--></span></span></a></p>  
<p class="MsoNormal" style="line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri;">As investments mature, production grows, and costs decline. As a result of CARB's previous actions, numerous models of MHD ZEVs are now available for purchase from 30 different manufacturers, a 625 percent increase from 2019.<a style="mso-footnote-id: ftn32;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn32" name="\_ftnref32"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[32]</span></span><!--[endif]--></span></span></a></span>Already, CARB has listed 154 HVIP-approved ZEVs, including models for each major segment of the MHDV market.<a style="mso-footnote-id: ftn33;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn33" name="\_ftnref33"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[33]</span></span><!--[endif]--></span></span></a> New announcements continue pouring in for vehicle offerings,<a style="mso-footnote-id: ftn34;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn34" name="\_ftnref34"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[34]</span></span><!--[endif]--></span></span></a> manufacturing and battery factories, and ZEV procurement and sale

commitments.<a style="mso-footnote-id: ftn35;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn35" name="\_ftnref35"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[35]</span></span><!--[endif]--></span></span></a> Helping drive the transition is growing demand from fleets increasingly turning to ZEV technology to lower fuel and maintenance costs and deliver on environmental, social, and corporate governance strategies. CARB's analysis shows that many MHD ZEV vocations today have a positive total cost of ownership (TCO). By<span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri;"> 2030, MHD ZEVs in nearly every vehicle category are expected to have a more favorable TCO than their combustion counterparts.<a style="mso-footnote-id: ftn36;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn36" name="\_ftnref36"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[36]</span></span><!--[endif]--></span></span></a><span style="color: black; mso-themecolor: text1;"> However, the ISOR analysis excludes the recent federal incentives for manufacturers and purchasers of MHD ZEVs.</span></span></p><p class="MsoNormal" style="line-height: normal;"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">As described below, when the incentives in the federal IIJA and IRA are included, every category of MHD ZEVs will have a favorable TCO, as well as up-front purchase price parity with their diesel counterparts well before 2036.<a style="mso-footnote-id: ftn37;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn37" name="\_ftnref37"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; color: black; mso-themecolor: text1; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[37]</span></span><!--[endif]--></span></span></a> These findings are corroborated by preliminary results from a forthcoming report (Attachment H) showing that the IRA credits will accelerate ZEV's purchase parity with a diesel equivalent so that all segments analyzed will meet purchase price parity with their diesel

counterparts immediately in 2023.

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The case for a stronger sales mandate is overwhelming. The Board should direct Staff to revise the proposal to require 100 percent ZEV sales beginning in 2036.

## 2. Reduce Class 7 and 8 Tractor Pollution

Even with 100 percent ZEV sales by 2036, over 750,000 MHDVs, roughly a third of all MHDVs driving on California roads would be polluting combustion engine vehicles.

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Additional action is needed to meet air quality and GHG targets, as well as the objectives established in Governor Newsom's Executive Order. CARB can begin by doing more in the final ACF rule to cut pollution from Class 7 and 8 tractors. Critically, Governor Newsom's order and CARB's ACT Board Resolution call for CARB to fully convert drayage vehicles to ZEV operations by 2035. The rule cannot achieve these goals as currently structured.

Class 7 and 8 tractors ("tractors") contribute a significant and disproportionate amount of the climate-warming and air pollution from California's heavy-duty fleet. While only about 1 percent of the state's total vehicle population, tractors

are responsible for around 13 percent of GHG emissions, 25 percent of PM2.5, and 33 percent of NOx from on-road cars and trucks. Furthermore, tractors play an outsized role in contributing pollution to communities already overburdened by air pollution and most vulnerable to climate change impacts.

**Source:** Advanced Clean Fleets Rule, Initial Statement of Reasons

As seen in the graphic above, tractors constitute nearly half of vehicles subject to the High Priority Fleets category.

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Since tractors represent an outsized share of the regulated fleets, CARB must focus on transitioning more of these vehicles sooner.

While the ACF rule's drayage requirement addresses port and railyard tractor operations, tractors not visiting these facilities either fall under the High Priority Fleets requirement or remain unregulated by the rule. Further, under the proposed High Priority Fleet requirements, Class 8 sleeper cab tractors are on an unnecessarily delayed transition timeline, especially given the IRA's purchase incentives.

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Targeting tractors for more rapid electrification must be a central focus of the final rule and will provide significant near-term public health benefits. To do so, CARB should accelerate the High Priority Fleet milestone dates for sleeper cab tractors and lower the High Priority Fleet threshold to 10 or more vehicles for all Class 7 and 8 tractors.

### 2a. Begin High Priority Fleet Sleeper Cab Tractor Electrification in 2027

The current Staff proposal allows High Priority Fleets that choose the ZEV Milestones Option to avoid transitioning any sleeper cab tractors until 2030. This is an unnecessary delay. Given the current pace of innovation, coming vehicle offerings, the normal replacement rate of older trucks, and

compliance flexibilities, fleets should be able to meet the initial 10 percent zero-emission sleeper cab tractor requirement in 2027.

Nearly a third of California's sleeper cabs travel on average less than 300 miles per day, meaning long-range batteries are not required to begin electrifying a significant portion of these tractors, making them well suited for electrification. Moreover, moving sleeper cabs from Group 3 to Group 2 does not mean 10 percent of sleeper cabs will need to be electrified in 2027. Fleets can choose which trucks to electrify under the ZEV Milestones Option, regardless of what type of tractor is used.

Moreover, heavy-duty regional haul tractors from five different manufacturers are either in use, in serial production, or slated for delivery in 2022: BYD 8TT Tractor (in use), Peterbilt Model 579EV, Volvo VNR Electric (in use),

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Because many of these sleeper cab tractors operate the same way as day cabs, CARB should require all of these tractors to be on the same schedule and to begin transitioning to zero emissions in 2027. Failing to treat tractors equally could create a perverse incentive for fleets to replace day cabs with sleeper cabs to delay compliance deadlines.

Source: Advanced Clean Fleets Rule, Initial Statement of Reasons

### 2b. Lower the High Priority Fleet Threshold to 10 Vehicles for Class 7 and 8 Tractors

Fleets of Class 7 and 8 tractors are fundamentally different, in operation and impact, from other MHDV fleets and should be given separate considerations and requirements under the rule. Lowering the threshold for Class 7 and 8 tractor fleets from 50 to 10 is estimated to deliver significantly greater climate and air quality benefits and address critical labor concerns while avoiding burdens for small businesses and undue implementation costs.

Lowering the High Priority Fleet Threshold to 10 or more tractors would provide roughly an additional 15 percent reduction in GHG, PM2.5, and NOx emissions from the statewide fleet of tractor trucks.

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<sup>49</sup> Given that these trucks are responsible for around half of all GHG, PM2.5, and NOx emissions from the state's fleet of trucks and buses, this translates to a significantly more effective regulation while avoiding impacts to the smallest fleets. This is especially impactful for frontline communities disproportionately burdened by pollution from drayage vehicles that may not directly serve a port or railyard.

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**Calibri**

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padding: 0in 5.4pt 0in 5.4pt; height: 19.5pt;" width="24%">
<p class="MsoNormal" style="text-align: center;"

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>86%

Source: UCS analysis of ARBER data

Fleets greater than 10 are estimated to be responsible for nearly 90 percent of GHGs, PM2.5, and NOx emitted by Class 7 and 8 tractors but represent just 13 percent of all tractor fleets. A lower numeric compliance threshold for tractors would increase the number of fleets regulated under the rule but represents an excellent return on investment for CARB staff.

Source: UCS analysis of ARBER data

A lower tractor threshold would also mitigate continued driver misclassification in fleets from 10 to 50 by bringing them under the "ownership and controlling interest" definition CARB included in the proposed regulation. As members of our coalition from the labor community detailed to CARB in previous letters (see Attachment B), legitimate (i.e., properly classified) independent contractors cannot own and operate more than a handful of trucks (i.e., 4-5) and therefore would not be affected by lowering the fleet threshold to 10 trucks. In California, as in much of the rest of the US, there is a large segment of for-hire trucking operations (approximately 30 percent by truck count) between five trucks and thousands of trucks that engage independent contractors to perform the work of a company in functional control of the business. These trucking operations work on the misclassification business model, mixing functional control of a larger entity with the deceptive engagement of drivers as 1099 contractors.

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[50] Lowering the threshold to 10 will not harm small fleets and those of "independent owners and operators" since these fleets typically have five or fewer vehicles.

By holding companies that do not misclassify, and educating drivers on their rights, CARB will create important industry structures that incentivize companies to absorb costs, reduce the incentive to misclassify, empower drivers to resist exploitation,



for ZEVs compared to ICE vehicles will not be overcome until 2040.

Response: Regional and national charging corridor concerns do not account for passage of the IIJA and IRA, and the radically reshaped landscape created by new federal funding. The federal government has approved California's proposal under the National Electric Vehicle Infrastructure program, and there is reason to believe those investments will increase substantially over the next five years. Indeed, Governor Newsom recently signed a statement of cooperation intended to accelerate the development of the West Coast zero-emission truck corridor within ten years. In addition, new announcements of private investments in charging corridors continue to accumulate but are omitted from the ISOR.

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[51]

Setting aside whether purchase price or TCO is the appropriate point of comparison, as referenced previously, analysis shows that new federal incentives cause upfront purchase price for MHD ZEV to be lower than the purchase price for diesel trucks in every vehicle category well before 2036.

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[52]

Notably, the ISOR's rejection of the 2036 100 percent sales target is not based on concerns around the availability of zero-emission trucks: "the 2036 timeframe does provide time for ZE solution [to challenging use cases] to be identified."

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[53]

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**Manufacturers** will be able to electrify all new trucks by 2036, and requiring them to do so will provide greater health and economic benefits while avoiding the creation of supply and demand imbalances and excessive ACT rule credit surpluses.

**Small Business Impact**

**Concern:** Alternative 2 would immediately bring in a wide range of smaller businesses that could have less access to capital versus larger fleets and might face difficulty making the needed investments in ZEVs and infrastructure.

**Response:** ZEV tractors are competitive due to the substantial fuel and maintenance cost savings, and the TCO is expected to be about half of that for a comparable diesel tractor by 2035.

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Importantly, the ISOR does not include the significant resources unlocked in the IRA, including up to \$40,000 in vehicle tax credits and a 30 percent credit (up to \$100,000) for the cost of charging

infrastructure. Factoring in the IRA tax credits, a Class 8 specialty truck is expected to reach cost parity with its diesel counterpart by 2028.<a style="mso-footnote-id: ftn56;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn56" name="\_ftnref56"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[56]</span></span><!--[endif]--></span></span></a> With the IRA ZEV credit, all vehicles will reach purchase price parity by 2031, with 9 of the 14 vehicle categories reaching parity by 2027, when the Group 2 and 3 ZEV Milestone schedule begins in Alternative 2. To the extent smaller businesses are considering buying new (or used) Class 7 and 8 tractors after 2027, the economics will favor purchasing zero-emission options.</p><p class="MsoNormal"><span style="mso-spacerun: yes;">&nbsp;</span></p><p class="MsoNormal"><em>Source: ERM,</em> <em>Investment Reduction Act Supplemental Assessment: Analysis of Alternative MHD ZEV Business-as-Usual Scenarios</em></p><p class="MsoNormal">It is also important to keep financing concerns in perspective. First, considerable capital asset differences exist to secure financing between a fleet of 10 cargo vans and a fleet of 10 Class 7 and 8 tractors. For example, in CARB's recent Voucher Incentive Program proposal, the agency used 10 trucks as the cutoff for those fleets deserving of incentive assistance.<a style="mso-footnote-id: ftn57;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn57" name="\_ftnref57"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[57]</span></span><!--[endif]--></span></span></a> Second, a lower fleet size corresponds with a smaller purchase requirement. These smaller fleets will be able to meet percentage targets with only a small number of tractors or can comply through the rule's alternative pathway by replacing older trucks only as needed with zero-emission ones. The issue, therefore, is about financing the purchase of one to a small number of zero-emission trucks. Finally, it is odd to point to financing and access to capital as a barrier to complying with stronger standards that will not take effect until 2027, when CARB is required by law to develop financing tools to be available to operators of MHD fleets by January 1, 2023.<a style="mso-footnote-id: ftn58;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-

20221%20(Updated).docx#\_ftn58"

name="\_ftnref58"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[58]</span></span><!--[endif]--></span></span></a></p>  
<p class="MsoNormal"><u>Concern</u>: Smaller fleets are more likely to purchase used vehicles. ZEVs may not enter the used truck market fast enough for smaller fleets to meet Alternative 2&rsquo;s accelerated time frame.</p>

<p class="MsoNormal"><u>Response</u>: The ISOR analysis assumes lower thresholds for all truck fleets and changes to the timelines for both Group 2 and 3 trucks. Commenters&rsquo; proposal would not change any requirements affecting fleets until 2027, and then only those fleets with 10 or more Class 7 and 8 tractors.</p>

<p class="MsoNormal">While the purchasing behaviors of these tractor fleets are unclear, assuming some rely on purchasing used diesel trucks, the economics suggest those fleets would see significant savings if they switched from purchasing used diesel vehicles to purchasing new zero-emission tractors. Today, the TCO for buying a new electric day cab tractor is lower than that for a comparable used diesel. Consequently, smaller fleets accustomed to only buying used diesel vehicles will experience lower TCO costs by purchasing a new electric truck.<span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;"> The electric day cab will save \$170,893, or 30 percent, over the TCO of a used diesel tractor when including the new \$40,000 Federal Tax Credit provided through the IRA.<a style="mso-footnote-id: ftn59;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn59"

name="\_ftnref59"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; color: black; mso-themecolor: text1; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[59]</span></span><!--[endif]--></span></span></a> The table below explains the TCO difference between a used diesel and an electric day cab tractor. The conservative estimate of 33 percent EVSE (charging infrastructure) cost savings reflects the substantial state and federal programs to pay for charging infrastructure excluded from Staff&rsquo;s TCO study. Including these additional savings, the electric day cab&rsquo;s TCO is \$231,822, or 41 percent less than the used diesel.</span></p>

<p>&nbsp;</p>  
<p class="MsoNormal"><em>Source: Attachment D</em></p>  
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Source: Attachment D

### 3.

The table below explains the TCO difference between a used diesel and an electric day cab tractor. The conservative estimate of 33 percent EVSE (charging infrastructure) cost savings reflects the substantial state and federal programs to pay for charging infrastructure excluded from Staff's TCO study. Including these additional savings, the electric day cab's TCO is \$231,822, or 41 percent less than the used diesel.



### Concern: Market forces must be considered in expanding the early ZEV market. The ACT rule guarantees a supply of ZEVs in the California market. However, Alternative 2 would result in a fast ramp-up of additional ZEV demand significantly above the expected supply of ZEVs that may put upward pressure on vehicle prices. Market dynamics concentrated in the hands of consumer fleets would help maintain downward price pressures and bring ZEV costs in line with other technologies sooner.

Response: As noted above, Commenters' proposal would not change any requirements in effect before 2027, so much of the concerns about rapid expansion, learning, and market imbalances are irrelevant. There should be considerable confidence in the market and its ability to ramp up over the next five years before the first increment of Class 7 and 8 tractor purchases would be required. The market is rapidly expanding, with large orders already being placed — Sysco letter of intent for 800 Freightliner eCascadia Class 8 Semis from Daimler by 2026

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ZEVs will be available to meet fleet needs.<a style="mso-footnote-id: ftn64;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn64" name="\_ftnref64"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[64]</span></span><!--[endif]--></span></span></a> For example, the IRA contains a \$100,000 incentive for alternative fueling stations for the next ten years.<a style="mso-footnote-id: ftn65;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn65" name="\_ftnref65"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[65]</span></span><!--[endif]--></span></span></a> Additionally, the US Joint Office of Energy and Transportation's approval of California's Deployment Plan for the National Electric Vehicle Infrastructure (NEVI) Program makes an initial \$56 million in funding available to install charging stations throughout the state. MHD infrastructure needs are expected to be included in the subsequent four years of this five-year \$384 million program for California.<a style="mso-footnote-id: ftn66;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn66" name="\_ftnref66"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[66]</span></span><!--[endif]--></span></span></a></p><p class="MsoNormal">Aside from funding, Governor Newsom recently signed AB 2700<span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri;"> to enable more strategic grid planning and investment to accommodate future EV charging needs.<a style="mso-footnote-id: ftn67;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Con

tent.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn67"

name="\_ftnref67"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[67]</span></span><!--[endif]--></span></span></a> The bill requires state agencies to collaborate in gathering and sharing fleet data for on-road and off-road MHDVs with electric utilities and directs utilities to conduct strategic grid planning and investment to ensure the grid is proactively prepared to accommodate all the new electric cars and trucks coming over the next decade. To maximize AB 2700's value, CARB should collect and share information from fleets related to vehicle type, number of vehicles, fuel type/charging type, locations (where vehicles are domiciled), operational profile, and timeline. This will be especially helpful for avoiding infrastructure bottlenecks in areas with high concentrations of MHD ZEVs, avoiding delays and costly upgrades done on an emergency basis that could otherwise frustrate electrification.<a style="mso-footnote-id: ftn68;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn68" name="\_ftnref68"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-fareast-font-family: Calibri; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[68]</span></span><!--[endif]--></span></span></a></span></p><p class="MsoNormal">The Governor also just signed a Statement of Cooperation with Oregon, Washington, and British Columbia to advance the creation of a MHD ZEV corridor along I-5 from Southern California to British Columbia within the next ten years.<a style="mso-footnote-id: ftn69;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn69" name="\_ftnref69"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[69]</span></span><!--[endif]--></span></span></a> It is odd to justify the rejection of health and economically beneficial and otherwise feasible alternatives by pointing to barriers California has committed to addressing.</p><p class="MsoNormal">Attachment C expands on the activity underway in California and nationally to meet the <a name="\_Int\_yDv3m4lx"></a>charging needs of a more ambitious ACF rule. Some highlights include:</p><p class="MsoListParagraphCxSpFirst" style="text-indent: -.25in; mso-list: l5 level1 lfo4;"><!-- [if !supportLists]--><span

[illegible]

>[72]</span></span><!--[endif]--></span></span></a></p>  
<p class="MsoListParagraphCxSpLast" style="text-indent: -.25in; mso-list: l5 level1 lfo4;"><!-- [if !supportLists]--><span style="font-family: Symbol; mso-fareast-font-family: Symbol; mso-bidi-font-family: Symbol;"><span style="mso-list: Ignore;">&#x2022;<span style="font: 7.0pt 'Times New Roman'">&#x200b;&#x200b;&#x200b;&#x200b;&#x200b;&#x200b;&#x200b;&#x200b;</span></span><!--[endif]-->The Megawatt Charging System (MCS) standard will be in place beginning in 2024 and can charge a fully loaded Class 8 long-haul tractor in 30 minutes.<a style="mso-footnote-id: ftn73;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftn73" name="\_ftnref73"><span class="MsoFootnoteReference"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 11.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: Arial; mso-bidi-theme-font: minor-bidi; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[73]</span></span><!--[endif]--></span></span></a></p>  
<h2 style="margin-bottom: 8.0pt;">Conclusion</h2>  
<p class="MsoNormal">The ACF rule will provide overwhelming public health, economic, and climate benefits. Many elements of the current proposal are sufficiently strong and must be retained, particularly the drayage and public fleet requirements and commitment to only allow zero-emission technology for compliance. Despite these strong elements, more can and should be done. Even with Alternative 2, the ACF rule will not guarantee the level of ZEV deployments necessary to achieve our objectives: <span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri; color: black; mso-themecolor: text1;">to clean up air pollution and slow climate change</span>. However, directing Staff to include our changes is a necessary step to bridge that gap and add momentum to the ongoing ZEV transition.</p>  
<div style="mso-element: footnote-list;"><!-- [if !supportFootnotes]--><br clear="all" /><hr align="left" size="1" width="33%" /><!--[endif]-->  
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[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[1]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">OECD, International Transport Forum 2021 Outlook, (May 2021)</span><a href="https://www.oecd-ilibrary.org/sites/e8125f08-en/index.html?itemId=/content/component/e8125f08-en"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.oecd-ilibrary.org/sites/e8125f08-en/index.html?itemId=/content/component/e8125f08-en</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">.<span style="mso-spacerun: yes;">&nbsp;&nbsp;&nbsp;</span></span></p></div><div id="ftn2" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn2;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref2" name="\_ftn2"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[2]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">CARB, Mobile Source Strategy Presentation, (Oct. 28, 2021)</span><a href="https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2021/102821/21-11-2pres.pdf"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2021/102821/21-11-2pres.pdf</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">.<span style="mso-spacerun: yes;">&nbsp;</span></span></p></div><div id="ftn3" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn3;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref3" name="\_ftn3"><span class="MsoFootnoteReference"><span

style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[3]</span></span><!--[endif]--></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Mary Demetillo et al., Space-Based Observational Constraints on NO2 Air Pollution Inequality from Diesel </span></p><p class="MsoFootnoteText"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Traffic in Major US Cities (Aug. 25, 2021) </span><a href="https://doi.org/10.1029/2021GL094333"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://doi.org/10.1029/2021GL094333</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-theme-font: minor-latin;">.</span></p></div><div id="ftn4" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn4;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref4" name="\_ftn4"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: 'Yu Mincho'; mso-fareast-theme-font: minor-fareast; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: 'Yu Mincho'; mso-fareast-theme-font: minor-fareast; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[4]</span></span><!--[endif]--></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: 'Yu Mincho'; mso-fareast-theme-font: minor-fareast; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">S</span><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">ee also </span><a href="https://www.healtheffects.org/publication/systematic-review-and-meta-analysis-selected-health-effects-long-term-exposure-traffic"><span style="font-size: 8.0pt; mso-fareast-font-family: 'Segoe UI'; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.healtheffects.org/publication/systematic-review-and-meta-analysis-selected-health-effects-long-term-exposure-traffic</span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">; </span><a href="https://www.edf.org/media/study-new-research-links-higher-street-level-traffic-related-air-pollution-increased"><span style="font-size: 8.0pt; mso-fareast-font-family: 'Segoe UI';



mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><https://www.edf.org/media/study-new-research-links-higher-street-level-traffic-related-air-pollution-increased>

<https://www.edf.org/media/new-study-reveals-large-and-unequal-health-burden-air-pollution-californias-bay-area>

<https://www.edf.org/media/study-street-level-air-pollution-increases-health-risk-among-elderly>

**fn5**

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref5](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref5)

**fn5**

<https://www.edf.org/media/study-street-level-air-pollution-increases-health-risk-among-elderly>

Carol Zabin et al., Truck Driver Misclassification: Climate, Labor, and Environmental Justice Impacts (Aug 22, 2019)

<https://laborcenter.berkeley.edu/truck-driver-misclassification/>

**fn6**

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref6](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref6)

**fn6**

EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA; ">[6]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Exec. <span style="color: black; mso-themecolor: text1;">Order No. 79-20 (2020) </span></span><a href="https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf</span></a></p></div><div id="ftn7" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn7;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref7" name="\_ftn7"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[7]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">CARB, Mobile Source Strategy Presentation, (Oct. 28, 2021) </span><a href="https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2021/102821/21-11-2pres.pdf"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2021/102821/21-11-2pres.pdf</span></a></p></div><div id="ftn8" style="mso-element: footnote;"><p class="MsoNormal" style="margin-bottom: 0in; line-height: 107%;"><a style="mso-footnote-id: ftn8;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref8" name="\_ftn8"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[8]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; line-height: 107%; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri;

mso-bidi-theme-font: minor-latin;"> CARB, Advanced Clean Fleets Initial Statement of Reasons, 275, (August 30, 2022).</span></p></div>

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[if !supportFootnotes]--><span class="MsoFootnoteReference"><span

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'Calibri',sans-serif; mso-ascii-theme-font: minor-latin;

mso-fareast-font-family: Calibri; mso-hansi-theme-font:

minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language:

EN-US; mso-fareast-language: EN-US; mso-bidi-language:

AR-SA;">[9]</span></span><!--[endif]--></span></span></span></a><span

style="font-size: 8.0pt; mso-fareast-font-family: Calibri;

mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">

Ellen Robo et. al., California Clean Trucks Program: An Analysis of the Impacts of Low NOx and Zero-Emission Medium- and Heavy-Duty Trucks on the Environment, Public Health, Industry, and the Economy, (2022) </span><a

href="https://www.nrdc.org/sites/default/files/media-uploads/california\_clean\_trucks\_program.pdf"><span

style="font-size: 8.0pt; mso-bidi-font-family: Calibri;

mso-bidi-theme-font:

minor-latin;">https://www.nrdc.org/sites/default/files/media-

uploads/california\_clean\_trucks\_program.pdf</span></a></p>

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name="\_ftn10"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri;

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[if !supportFootnotes]--><span class="MsoFootnoteReference"><span

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'Calibri',sans-serif; mso-ascii-theme-font: minor-latin;

mso-fareast-font-family: Calibri; mso-hansi-theme-font:

minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language:

EN-US; mso-fareast-language: EN-US; mso-bidi-language:

AR-SA;">[10]</span></span><!--[endif]--></span></span></span></a><span

style="font-size: 8.0pt; mso-fareast-font-family: Calibri;

mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">

In the ISOR, Alternative 2 includes setting the ZEV Milestones Option for Group 2 vehicles to be the same as Group 1. These comments are not suggesting this change be made when it refers to adoption of Alternative 2. In all other cases, Commenters support and agree with the inclusions in Alternative 2. </span></p>

</div>

<div id="ftn11" style="mso-element: footnote;">

<p class="MsoFootnoteText"><a style="mso-footnote-id: ftn11;" title=""

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name="\_ftn11"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[11]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">ISOR, pg. 238</span></p></div>

<div id="ftn12" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn12;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref12" name="\_ftn12"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[12]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">ISOR, pg. 239</span></p></div>

<div id="ftn13" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn13;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref13" name="\_ftn13"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[13]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Ellen Robo et. al. California Clean Trucks Program: An Analysis of the Impacts of Low NOx and Zero-Emission Medium- and Heavy-Duty Trucks on the Environment, Public Health, Industry, and the Economy, (2022) </span><a href="https://www.nrdc.org/sites/default/files/media-

[uploads/california\\_clean\\_trucks\\_program.pdf](https://www.nrdc.org/sites/default/files/media-uploads/california_clean_trucks_program.pdf)

[California Clean Trucks Program](#)

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<sup>14</sup> American Lung Association, State of the Air & Report Card: California (Accessed July 24, 2022)

<sup>15</sup> American Lung Association, Most Polluted Cities 2022, (2022)

<https://www.lung.org/research/sota/city-rankings/most-polluted-cities>

<https://www.lung.org/research/sota/city-rankings/most-polluted-cities>

**Footnote 16**

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref16](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref16)

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Chris Busch et al., California Energy Policy Simulator Update &dash; Earlier Action Delivers Social and Economic

Benefits (June 16, 2022)

<https://energyinnovation.org/wp-content/uploads/2022/06/California-Energy-Policy->

Simulator-Insights.pdf.

**Footnote 17**

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref17](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref17)

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref17](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref17)

Kaveh Waddell and Maanvi Singh, Warehouses in their Backyards: When

Amazon Expands, These Communities Pay the Price (Dec. 9, 2021)

<https://www.theguardian.com/us-news/2021/dec/09/when-amazon-expands-these-communities-pay-the-price>

<https://www.theguardian.com/us-news/2021/dec/09/when-amazon-expands-these-communities-pay-the-price>

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**Footnote 18:**

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref18](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref18)

Pitzer College, Estimated Warehouse Distribution in San Bernardino and Riverside Counties (2022)

<https://www.pitzer.edu/redfordconservancy/mapping-data-visualization/>

<https://www.pitzer.edu/redfordconservancy/mapping-data-visualization/>

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**Footnote 19:**

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref19](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref19)

mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA; ">[19]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; line-height: 107%; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> <span style="color: #333333;">Priyanka N. deSouza, Sudheer Ballare, Deb A. Niemeier, The environmental and traffic impacts of warehouses in southern California, Journal of Transport Geography, Volume 104, 2022, 103440, ISSN 0966-6923,</span></span><a href="https://www.google.com/url?q=https://doi.org/10.1016/j.jtrangeo.2022.103440&sa=D&source=docs&ust=1665163591685946&usg=AOvVaw0vaXvuCpw0a-A9PtTrKFuv"><span style="font-size: 8.0pt; line-height: 107%; mso-fareast-font-family: 'Segoe UI'; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://doi.org/10.1016/j.jtrangeo.2022.103440</span></a><span style="font-size: 8.0pt; line-height: 107%; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin; color: #333333;">.</span></p></div><div id="ftn20" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn20;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref20" name="\_ftn20"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[20]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">ISOR pg. 241</span></p></div><div id="ftn21" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn21;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref21" name="\_ftn21"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[21]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">



ISOR, List of Alternatives </span></p>

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<div id="ftn22" style="mso-element: footnote;">

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name="\_ftn22"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[22]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">

Ellen Robo et. al. An Analysis of the Impacts of Low NOx and Zero-Emission Medium- and Heavy-Duty Trucks on the Environment, Public Health, Industry, and the Economy, (2022) </span><a href="https://www.nrdc.org/sites/default/files/media-uploads/california\_clean\_trucks\_program.pdf"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.nrdc.org/sites/default/files/media-uploads/california\_clean\_trucks\_program.pdf</span></a></p>

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name="\_ftn23"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[23]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">ibid</span></p>

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<div id="ftn24" style="mso-element: footnote;">

<p class="MsoFootnoteText"><a style="mso-footnote-id: ftn24;" title=""

href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref24"

name="\_ftn24"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--

[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[24]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="color: black; mso-themecolor: text1;">Noel Melton, Jonn Axsen, Barbar Moawad, <a name="\_Int\_lFqdBQEy"></a>Which plug-in electric vehicle policies are best? A multi-criteria evaluation framework applied to Canada.&rdquo; <em>Energy Research & Social Science</em>, Volume 64, 2020, <a name="\_Int\_VE6KSikS"></a>101411,ISSN 2214-6296, https://doi.org/10.1016/j.erss.2019.101411.</span></span></p></div><div id="ftn25" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn25;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref25" name="\_ftn25"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[25]</span></span><!--[endif]--></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Giles Parkinson, &ldquo;Biggest technology leap in history:&rdquo; Australia missing out on electric truck revolution (September 28, 2022) </span><a href="https://thedriven.io/2022/09/28/biggest-technology-leap-in-history-australia-missing-out-on-electric-truck-revolution/"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://thedriven.io/2022/09/28/biggest-technology-leap-in-history-australia-missing-out-on-electric-truck-revolution/</span></a></p></div><div id="ftn26" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn26;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref26" name="\_ftn26"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language:

AR-SA;">[26]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="color: black; mso-themecolor: text1;">See</span></span></span><a href="https://northamerica.daimlertruck.com/PressDetail/daimler-truck-north-america-nextera-energy-2022-01-31"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Daimler Truck North America,</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin; color: black; mso-themecolor: text1;"> </span><a href="https://electrek.co/2022/07/14/volvo-trucks-charging-network/"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Volvo Trucks</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin; color: black; mso-themecolor: text1;">, </span><a href="https://www.pensketruckleasing.com/full-service-leasing/leasing-services/electric-fleets/"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Penske Trucks</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin; color: black; mso-themecolor: text1;">, </span><a href="https://www.natsoaltfuels.com/EVCharging.php"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">NATSO</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin; color: black; mso-themecolor: text1;">, </span><a href="https://www.loves.com/en/news/2020/august/electrify-america-announces-collaboration-with-loves-travel-stops"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Loves Travel Stops</span></a></p></div><div id="ftn27" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn27;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref27" name="\_ftn27"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[27]</span></span><!--[endif]--></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="color: black; mso-themecolor: text1;">See, e.g., Volvo, &ldquo;News and Stories&rdquo; </span></span><a

[<span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.volvotrucks.com/en-en/news-stories.html</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin; color: black; mso-themecolor: text1;"> ; Daimler, "Global Media Site" &rdquo; </span><a href="https://media.daimlertruck.com/marsMediaSite/en/instance/ko/Start.xhtml?oid=4836258"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://media.daimlertruck.com/marsMediaSite/en/instance/ko/Start.xhtml?oid=4836258</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin; color: black; mso-themecolor: text1;"> ; Traton, Press Releases" &rdquo; </span><a href="https://traton.com/en/newsroom/press\\_releases.html"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://traton.com/en/newsroom/press\\_releases.html</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin; color: black; mso-themecolor: text1;"> .</span></p></div><div id="ftn28" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn28;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref28" name="\\_ftn28"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--\[if !supportFootnotes\]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">\[28\]</span></span><!--\[endif\]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Ryan Kennedy, EV Battery gigafactory with 54 GWh Output Planned for Southern California \(April 19, 2022\) </span><a href="https://pv-magazine-usa.com/2022/04/19/ev-battery-gigafactory-with-54-gwh-output-planned-for-southern-california/"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://pv-magazine-usa.com/2022/04/19/ev-battery-gigafactory-with-54-gwh-output-planned-for-southern-california/</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"></span></p></div><div id="ftn29" style="mso-element: footnote;"><p class="MsoNormal" style="margin-bottom: 0in;"><a](https://www.volvotrucks.com/en-en/news-stories.html)

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href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref29"  
name="\_ftn29"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[29]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; line-height: 107%; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> Caballero, Nicholas, Tesla Files Application for EV Battery Production in Fremont, California (September 3, 2022) </span><a href="https://www.torquenews.com/15475/tesla-files-application-ev-battery-production-fremont-california"><span style="font-size: 8.0pt; line-height: 107%; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.torquenews.com/15475/tesla-files-application-ev-battery-production-fremont-california</span></a><span style="font-size: 8.0pt; line-height: 107%; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">.</span></p></div>  
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[<span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--\[if !supportFootnotes\]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">\[31\]</span></span><!--\[endif\]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">&ldquo;Text - H.R.3684 &ndash; 117<sup>th</sup> Congress \(2021-2022\): Infrastructure Investment and Jobs Act.&rdquo;<em>Congress.gov,</em> Library of Congress, 16 November 2021, <https://www.congress.gov/>. </span></p><p class="MsoFootnoteText"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">"Text - H.R.5376 - 117<sup>th</sup> Congress \(2021-2022\): Inflation Reduction Act of 2022." <em>Congress.gov</em>, Library of Congress, 16 August 2022, <http://www.congress.gov/>.</span></p></div><div id="ftn32" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn32;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref32" name="\\_ftn32"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--\[if !supportFootnotes\]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">\[32\]</span></span><!--\[endif\]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">CALSTART, Zeroing in on Zero-Emission Trucks \(February 2022\)</span><a href="https://calstart.org/wp-content/uploads/2022/02/ZIO-ZETs-Report\\_Updated-Final-II.pdf"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://calstart.org/wp-content/uploads/2022/02/ZIO-ZETs-Report\\_Updated-Final-II.pdf</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"></span></p></div>](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref31)

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minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language:  
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AR-SA;">[33]</span></span><!--[endif]--></span></span></span></a><span  
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ISOR, Appendix J</span></p>  
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[if !supportFootnotes]--><span class="MsoFootnoteReference"><span  
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AR-SA;">[34]</span></span><!--[endif]--></span></span></span></a><span  
style="font-size: 8.0pt; mso-fareast-font-family: Calibri;  
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Fred Lambert, Mercedes Benz eActros Long-Haul Electric Truck<em>  
</em>September 19, 2022)<span style="mso-spacerun: yes;">&nbsp;</span></span></span><a  
href="https://electrek.co/2022/09/19/mercedes-benz-eactros-longhaul-electric-truck/"><span  
style="font-size: 8.0pt; mso-fareast-font-family: Calibri;  
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minor-latin;">https://electrek.co/2022/09/19/mercedes-benz-eactros-longhaul-electric-truck/</span></a><span  
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name="\_ftn35"><span class="MsoFootnoteReference"><span  
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AR-SA;">[37]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> See Attachment E</span></p></div><div id="ftn38" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn38;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref38" name="\_ftn38"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[38]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> See Attachment H</span></p></div><div id="ftn39" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn39;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref39" name="\_ftn39"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[39]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> E. Robo, n. 3</span></p></div><div id="ftn40" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn40;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref40" name="\_ftn40"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language:

EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA; ">[40]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> ISOR pg. 64 </span></p>  
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name="\_ftn43"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[43]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> </span><a href="https://en.byd.com/truck/class-8-day-cab/"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://en.byd.com/truck/class-8-day-cab/</span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> </span></p></div>

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name="\_ftn44"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[44]</span></span><!--[endif]--></span></span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> </span><a href="https://www.peterbilt.com/about/news-events/news-releases/peterbilt-model-579EV-now-available-for-customer-orders"><span style="font-size: 8.0pt;">https://www.peterbilt.com/about/news-events/news-releases/peterbilt-model-579EV-now-available-for-customer-orders</span></a></p></div>

<div id="ftn45" style="mso-element: footnote;">

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name="\_ftn45"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin;

mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA; ">[45]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> </span><a href="https://www.volvotrucks.us/trucks/vnr-electric/"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.volvotrucks.us/trucks/vnr-electric/</span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> </span></p></div><div id="ftn46" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn46;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref46" name="\_ftn46"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[46]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> </span><a href="https://freightliner.com/trucks/ecascadia/"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://freightliner.com/trucks/ecascadia/</span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> </span></p></div><div id="ftn47" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn47;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref47" name="\_ftn47"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[47]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> </span><a href="https://nikolamotor.com/tre-bev"><span style="font-size:

8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><https://nikolamotor.com/tre-bev>

8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref48](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref48)

<https://www.tesla.com/semi>

<https://www.tesla.com/semi>

<https://www.reuters.com/technology/musk-says-pepsico-take-delivery-tesla-semi-electric-trucks-dec-1-2022-10-07/>

Musk says Pepsi to receive Tesla's first Semi trucks in December | Reuters

<https://www.reuters.com/business/autos-transportation/pepsico-confirms-tesla-semi-truck-deliveries-start-december-2022-10-07/>

PepsiCo confirms Tesla Semi truck deliveries to start in December | Reuters

[file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref49](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref49)

style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> See Attachment F: "ACF Threshold Analysis Memo" completed by Union of Concerned Scientists staff using ARBER data</span></p></div><div id="ftn50" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn50;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref50" name="\_ftn50"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[50]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">UCB Labor Center, Truck Driver Misclassification (2019). </span><a href="https://laborcenter.berkeley.edu/pdf/2019/Truck-Driver-Misclassification.pdf"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://laborcenter.berkeley.edu/pdf/2019/Truck-Driver-Misclassification.pdf</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"></span></p></div><div id="ftn51" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn51;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref51" name="\_ftn51"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[51]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> See Attachment C, National Charging Infrastructure to Support Long-haul Operations</span></p></div><div id="ftn52" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn52;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Con

tent.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref52"

name="\_ftn52"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[52]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> See Attachment E</span></p></div>

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name="\_ftn53"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[53]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> ISOR at 254</span></p></div>

<div id="ftn54" style="mso-element: footnote;">

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Goldman School of Public Policy: University of California Berkeley, 2035 Report <em>(</em>2021) <em><span style="mso-spacerun: yes;">&nbsp;</span></em></span><a href="https://www.2035report.com/transportation/"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri;

mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><https://www.2035report.com/transportation/>

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</div>  
<div id="ftn56" style="mso-element: footnote;">  
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</div>  
<div id="ftn57" style="mso-element: footnote;">  
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minor-latin; mso-hansi-theme-font: minor-latin;  
mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US;  
mso-fareast-language: EN-US; mso-bidi-language:  
AR-SA; ">[57]</span></span><!--[endif]--></span></span></span></a><span  
style="font-size: 8.0pt; mso-bidi-font-family: Calibri;  
mso-bidi-theme-font: minor-latin;"> </span><a  
href="https://ww2.arb.ca.gov/sites/default/files/2022-  
09/DRAFT\_2023\_VIP\_Guidelines\_091622\_0.pdf"><span  
style="font-size: 8.0pt; mso-bidi-font-family: Calibri;  
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minor-latin;">https://ww2.arb.ca.gov/sites/default/files/2022-  
09/DRAFT\_2023\_VIP\_Guidelines\_091622\_0.pdf</span></a><span  
style="font-size: 8.0pt; mso-bidi-font-family: Calibri;  
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20221%20(Updated).docx#\_ftnref58"  
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style="mso-special-character: footnote;"><!-- [if  
!supportFootnotes]--><span class="MsoFootnoteReference"><span  
style="font-size: 8.0pt; line-height: 107%; font-family:  
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minor-latin; mso-hansi-theme-font: minor-latin;  
mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US;  
mso-fareast-language: EN-US; mso-bidi-language:  
AR-SA;">[58]</span></span><!--[endif]--></span></span></a><span  
style="font-size: 8.0pt; mso-bidi-font-family: Calibri;  
mso-bidi-theme-font: minor-latin;"> Health & Safety Code  
section 44274.12(a)(13 (SB372(Leyva))</span></p>  
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name="\_ftn59"><span class="MsoFootnoteReference"><span  
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minor-latin;"><span style="mso-special-character: footnote;"><!--  
[if !supportFootnotes]--><span class="MsoFootnoteReference"><span  
style="font-size: 8.0pt; line-height: 107%; font-family:  
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minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language:  
EN-US; mso-fareast-language: EN-US; mso-bidi-language:  
AR-SA;">[59]</span></span><!--[endif]--></span></span></span></a><span  
style="font-size: 8.0pt; mso-fareast-font-family: Calibri;  
mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">  
<span style="color: black; mso-themecolor: text1;">See Attachment  
D</span></span></p>  
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[<span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- \[if !supportFootnotes\]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">\[62\]</span></span><!-- \[endif\]--></span></span></span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> Volvo Trucks USA, Performance Team Scales Volvo VNR Electric Fleet, Supported by TEC Equipment \(October 6, 2022\) </span><a href="https://www.volvotrucks.us/news-and-stories/press-releases/2022/october/performance-team-scales-volvo-vnr-electric-fleet-supported-by-tec-equipment/"><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.volvotrucks.us/news-and-stories/press-releases/2022/october/performance-team-scales-volvo-vnr-electric-fleet-supported-by-tec-equipment/</span></a><span style="font-size: 8.0pt; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> </span></p></div><div id="ftn63" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn63;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\\_10-13-20221%20\(Updated\).docx#\\_ftnref63" name="\\_ftn63"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- \[if !supportFootnotes\]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">\[63\]</span></span><!-- \[endif\]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> Jorge Aguirre, Tesla Semi to Have 500 Mile Range, To Be Delivered This Year \(August 10, 2022\) </span><a href="https://www.notateslaapp.com/news/909/tesla-semi-to-have-500-mile-range-to-be-delivered-this-year#:~:text=The%20company%20has%20not%20said,%24150%2C000%20and%20%24180%2C000%20USD%20respectively"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.notateslaapp.com/news/909/tesla-semi-to-have-500-](file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter_10-13-20221%20(Updated).docx#_ftnref62)

mile-range-to-be-delivered-this-year#:~:text=The%20company%20has%20not%20said,%24150%2C000%20and%20%24180%2C000%20USD%20respectively</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">.

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<div id="ftn65" style="mso-element: footnote;">

<p class="MsoFootnoteText"><a style="mso-footnote-id: ftn65;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref65" name="\_ftn65"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[65]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="color: #333333;">"Text - H.R.5376 - 117th Congress (2021-2022): Inflation Reduction Act of 2022." <em>Congress.gov</em>, Library of Congress, 16 August 2022, http://www.congress.gov/.</span></span></p>

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<div id="ftn66" style="mso-element: footnote;">

<p class="MsoFootnoteText"><a style="mso-footnote-id: ftn66;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref66" name="\_ftn66"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--

[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[66]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">David Worford, 35 States Approved to Receive First Round of EV Charging Funds (September 15, 2022) </span><a href="https://www.environmentalleader.com/2022/09/35-states-approved-to-receive-first-ev-charging-funds/"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.environmentalleader.com/2022/09/35-states-approved-to-receive-first-ev-charging-funds/</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"></span></p></div><div id="ftn67" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn67;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref67" name="\_ftn67"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[67]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="color: #333333;">Transportation Electrification: Electrical Distribution Grid Upgrades, Cal. Assemb. B. 2700 (September 16, 2022), Chapter 354 </span></span><a href="https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\_id=202120220AB2700"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\_id=202120220AB2700</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"></span></p></div><div id="ftn68" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn68;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref68" name="\_ftn68"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri;

mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!-- [if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[\[68\]](#)</span></span><!-- [endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Muller, Miles. &rdquo; Newsom Signs Law to Ready the Grid for EV Adoption.&rdquo; <em>NRDC.</em> 2022 </span><a href="https://www.nrdc.org/experts/miles-muller/newsom-signs-law-ready-grid-ev-adoption"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.nrdc.org/experts/miles-muller/newsom-signs-law-ready-grid-ev-adoption</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"></span></p></div>

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<div id="ftn70" style="mso-element: footnote;">  
<p class="MsoFootnoteText"><a style="mso-footnote-id: ftn70;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref70" name="\_ftn70"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--

[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[70]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Daimler Truck North America, Daimler Truck North America, NextEra Energy Resources and BlackRock Renewable Power Announce Plans to Accelerate Public Charging Infrastructure for Commercial Vehicles Across the U.S. (January 31, 2022) </span><a href="https://northamerica.daimlertruck.com/PressDetail/daimler-truck-north-america-nextera-energy-2022-01-31"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://northamerica.daimlertruck.com/PressDetail/daimler-truck-north-america-nextera-energy-2022-01-31</span></a></p></div><div id="ftn71" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn71;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref71" name="\_ftn71"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri',sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[71]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Scooter Doll, Volvo Trucks to Construct Charging Network Throughout California (July 14, 2022) </span><a href="https://electrek.co/2022/07/14/volvo-trucks-charging-network/"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://electrek.co/2022/07/14/volvo-trucks-charging-network/</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"></span></p></div><div id="ftn72" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn72;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref72" name="\_ftn72"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family:

'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA; ">[72]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"> NATSO<span style="color: black; mso-themecolor: text1;">, ChargePoint and NATSO Launch Collaborative to Significantly&nbsp;Expand&nbsp;EV Charging&nbsp;Along Nation&rsquo;s Highways and in Rural Communities&nbsp;(February 6, 2020) </span></span><a href="https://www.chargepoint.com/about/news/chargepoint-and-natso-launch-collaborative-significantly-expand-ev-charging-along"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://www.chargepoint.com/about/news/chargepoint-and-natso-launch-collaborative-significantly-expand-ev-charging-along</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin; color: black; mso-themecolor: text1;"> </span></p></div><div id="ftn73" style="mso-element: footnote;"><p class="MsoFootnoteText"><a style="mso-footnote-id: ftn73;" title="" href="file:///C:/Users/drobinson/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/KYEMWH2D/ACF%20Coalition%20Comment%20Letter\_10-13-20221%20(Updated).docx#\_ftnref73" name="\_ftn73"><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"><span style="mso-special-character: footnote;"><!--[if !supportFootnotes]--><span class="MsoFootnoteReference"><span style="font-size: 8.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">[73]</span></span><!--[endif]--></span></span></span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">Mark Kane, CharIN Officially Launches the Megawatt Charging System (MCS) (June 15, 2022) </span><a href="https://insideevs.com/news/592360/megawatt-charging-system-mcs-launch/"><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;">https://insideevs.com/news/592360/megawatt-charging-system-mcs-launch/</span></a><span style="font-size: 8.0pt; mso-fareast-font-family: Calibri; mso-bidi-font-family: Calibri; mso-bidi-theme-font: minor-latin;"></span></p></div></div><p class="MsoNormal">List of Attachments:</p><p class="MsoNormal">Attachment A: <a href=".../lists/com-attach/193-acf-comments-ws-B2FT0lc6AD8EbVQj.pdf">Follow-Up Resources Supporting a 100% Sales Target in 2036</a></p><p class="MsoNormal">Attachment B: <a href=".../lists/com-attach/192-acf-comments-ws-UT0HYFAzBzsAdFQL.pdf">Labor Recommendations to CARB Concerning the Advanced Clean Fleets



Rule</a></p>

<p class="MsoNormal">Attachment C: <a href="../../lists/com-attach/189-acf-comments-ws-AWJTNF0DV2dV01Ax.pdf"><span style="mso-ascii-font-family: Calibri; mso-fareast-font-family: Calibri; mso-hansi-font-family: Calibri; mso-bidi-font-family: Calibri;">Medium- and Heavy-Duty EV Charging Infrastructure Sufficiency to Support A More Ambitious Advanced Clean Fleets Rule</span></a></p>

<p class="MsoNormal">Attachment D: TCO Comparison Between New Diesel and Used Electric Day Cab</p>

<p class="MsoNormal">Attachment E: <a href="https://www.erm.com/contentassets/154d08e0d0674752925cd82c66b3e2b1/edf-zev-baseline-technical-memo-addendum.pdf">Investment Reduction Act Supplemental Assessment: Analysis of Alternative MHD ZEV Business-as-Usual Scenarios</a></p>

<p class="MsoNormal">Attachment F: <a href="https://ucs-documents.s3.amazonaws.com/clean-vehicles/acf-threshold-analysis-memo-sep-22.pdf">&ldquo;ACF Threshold Analysis Memo&rdquo; completed by Union of Concerned Scientists staff using ARBER data</a></p>

<p class="MsoNormal">Attachment G: California Clean Trucks Program: An Analysis of the Impacts of Low NOx and Zero-Emission Medium- and Heavy-Duty Trucks on the Environment, Public Health, Industry, and the Economy</p>

<p class="MsoNormal">Attachment H: <em>Preliminary Findings</em>, Inflation Reduction Act 2022 Impact Study, Roush</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 11:22:19

No Duplicates.

## **Comment 18 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Jordan

Last Name: Brinn

Email Address: jbrinn@nrdc.org

Affiliation:

Subject: ElectrifyNY Coalition Statement on CARB ACF Rule

Comment:

<p>Hello,</p>

<p>Please see the attached statement from ElectrifyNY, a coalition of New York State advocates.&nbsp;</p>

<p>&nbsp;</p>

<p>&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/391-acf2022-VjMAalw4ADALeVMh.pdf>

Original File Name: ElectrifyNY Statement on CARB ACF Rulemaking.pdf

Date and Time Comment Was Submitted: 2022-10-27 13:52:56

No Duplicates.

**Comment 19 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Andrea

Last Name: Marpillero Colomina

Email Address: [andreacolomina@greenlatinos.org](mailto:andreacolomina@greenlatinos.org)

Affiliation: GreenLatinos

Subject: Support for strongest possible ACF Regulation

Comment:

`<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">In this comment I represent the position of GreenLatinos, a </span><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">comunidad of Latino/a/x environmental and conservation champions fighting against climate change and environmental degradation that intensifies systematic social, health, and economic injustices in our communities.&nbsp;  </span><strong id="docs-internal-guid-ff817627-7fff-f14e-fba1-27e5301969dc" style="font-weight: normal;"></strong></p>`

`<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">I comment today in support of CARB&rsquo;s alternative plan to bring more electric trucks to the road faster, and strengthen it to better address the dangerous polluting trucks on our roads, big-rigs.</span></p>`

`<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">California and the US on a whole has a deadly diesel pollution problem.</span><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Freight communities, neighborhoods near warehouses and families living next highways get the worst of it. The disproportionate exposure of these mostly Black and Brown communities to diesel exhaust pollution is one of the clearest examples of environmental racism.</span></p>`

`<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">We urgently need a new policy tool to cut pollution from trucks so we can save lives.</span></p>`

CARB's own research shows that the Accelerated ZEV Transition Alternative recommended by the agency will result in substantial additional benefits:

- Over 2,400 additional avoided premature deaths.
- \$34 billion in additional health benefits.
- \$34 billion in additional health benefits.

background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">An

background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: underline; -webkit-text-decoration-skip: none; text-decoration-skip-ink: none; vertical-align: baseline; white-space: pre-wrap;">additional 38% reduction

background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">in deadly diesel soot.

- dir="ltr" style="list-style-type: circle; font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre; margin-left: 36pt;" aria-level="2">

dir="ltr" style="line-height: 1.44; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt;" role="presentation">

background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">An

background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: underline; -webkit-text-decoration-skip: none; text-decoration-skip-ink: none; vertical-align: baseline; white-space: pre-wrap;">additional 50% reduction

background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">in smog-forming pollution.
- dir="ltr" style="list-style-type: circle; font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre; margin-left: 36pt;" aria-level="2">

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background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">A

background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: underline; -webkit-text-decoration-skip: none; text-decoration-skip-ink: none; vertical-align: baseline; white-space: pre-wrap;">44% greater reduction

background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">of climate change pollution.
- dir="ltr" style="list-style-type: circle; font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre;

margin-left: 36pt;" aria-level="2">  
<p dir="ltr" style="line-height: 1.44; background-color: #ffffff;  
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style="font-size: 11pt; font-family: Arial; color: #000000;  
background-color: transparent; font-weight: 400; font-style:  
normal; font-variant: normal; text-decoration: underline;  
-webkit-text-decoration-skip: none; text-decoration-skip-ink: none;  
vertical-align: baseline; white-space: pre-wrap;">\$10  
billion</span><span style="font-size: 11pt; font-family: Arial;  
color: #000000; background-color: transparent; font-weight: 400;  
font-style: normal; font-variant: normal; text-decoration: none;  
vertical-align: baseline; white-space: pre-wrap;"> in additional  
net societal benefits - over 20% improvement.</span></p>  
</li>  
</ul>  
<p dir="ltr" style="line-height: 1.44; background-color: #ffffff;  
margin-top: 17pt; margin-bottom: 0pt;"><span style="font-size:  
11pt; font-family: Arial; color: #000000; background-color:  
transparent; font-weight: 400; font-style: normal; font-variant:  
normal; text-decoration: none; vertical-align: baseline;  
white-space: pre-wrap;">This rulemaking can play a crucial role in  
ending the perpetuation of environmental injustices that are  
literally shortening lives in Black and Brown communities across  
California.</span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt;  
margin-bottom: 0pt;"><span style="font-size: 11pt; font-family:  
Arial; color: #222222; background-color: transparent; font-weight:  
400; font-style: normal; font-variant: normal; text-decoration:  
none; vertical-align: baseline; white-space: pre-wrap;">We know  
that:</span></p>  
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start:  
48px;">  
<li dir="ltr" style="list-style-type: disc; font-size: 11pt;  
font-family: Arial; color: #222222; background-color: transparent;  
font-weight: 400; font-style: normal; font-variant: normal;  
text-decoration: none; vertical-align: baseline; white-space: pre;"  
aria-level="1">  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt;  
margin-bottom: 0pt;" role="presentation"><span style="font-size:  
11pt; font-family: Arial; color: #000000; background-color:  
transparent; font-weight: 400; font-style: normal; font-variant:  
normal; text-decoration: none; vertical-align: baseline;  
white-space: pre-wrap;">Living within</span><a  
style="text-decoration: none;"  
href="https://www.lung.org/our-initiatives/healthy-air/outdoor/air-  
pollution/highways.html"><span  
style="font-size: 11pt; font-family: Arial; color: #1155cc;  
background-color: transparent; font-weight: 400; font-style:  
normal; font-variant: normal; text-decoration: underline;  
-webkit-text-decoration-skip: none; text-decoration-skip-ink: none;  
vertical-align: baseline; white-space: pre-wrap;"> just one-third  
of a mile</span></a><span style="font-size: 11pt; font-family:  
Arial; color: #000000; background-color: transparent; font-weight:  
400; font-style: normal; font-variant: normal; text-decoration:  
none; vertical-align: baseline; white-space: pre-wrap;"> of a  
highway or close to ports, warehouse distribution centers or other  
freight corridors is devastating for lung health and can lead to  
early death.</span></p>  
</li>  
<li dir="ltr" style="list-style-type: disc; font-size: 11pt;  
font-family: Arial; color: #222222; background-color: transparent;  
font-weight: 400; font-style: normal; font-variant: normal;

text-decoration: none; vertical-align: baseline; white-space: pre;"  
aria-level="1">  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt;  
margin-bottom: 0pt;" role="presentation"><span style="font-size:  
11pt; font-family: Arial; color: #000000; background-color:  
transparent; font-weight: 400; font-style: normal; font-variant:  
normal; text-decoration: none; vertical-align: baseline;  
white-space: pre-wrap;">Low-income communities and communities of  
color shoulder the biggest burden of deadly diesel truck pollution,  
</span><a style="text-decoration: none;"  
href="https://www.npr.org/2022/03/10/1085882933/redlining-pollution-  
racism"><span  
style="font-size: 11pt; font-family: Arial; color: #1155cc;  
background-color: transparent; font-weight: 400; font-style:  
normal; font-variant: normal; text-decoration: underline;  
-webkit-text-decoration-skip: none; text-decoration-skip-ink: none;  
vertical-align: baseline; white-space: pre-wrap;">having suffered  
generations of systematic marginalization</span></a><span  
style="font-size: 11pt; font-family: Arial; color: #000000;  
background-color: transparent; font-weight: 400; font-style:  
normal; font-variant: normal; text-decoration: none;  
vertical-align: baseline; white-space:  
pre-wrap;">. &nbsp;</span></p>  
</li>  
<li dir="ltr" style="list-style-type: disc; font-size: 11pt;  
font-family: Arial; color: #000000; background-color: transparent;  
font-weight: 400; font-style: normal; font-variant: normal;  
text-decoration: none; vertical-align: baseline; white-space: pre;"  
aria-level="1">  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt;  
margin-bottom: 0pt;" role="presentation"><span style="font-size:  
11pt; font-family: Arial; color: #000000; background-color:  
transparent; font-weight: 400; font-style: normal; font-variant:  
normal; text-decoration: none; vertical-align: baseline;  
white-space: pre-wrap;">Residents living near ports, warehouses,  
and busy roads are exposed to such high rates of heavy-duty vehicle  
pollution that physicians have labeled these areas</span><a  
style="text-decoration: none;"  
href="https://www.latimes.com/local/california/la-me-freeway-pollution-what-  
you-can-do-20171230-htmstory.html"><span  
style="font-size: 11pt; font-family: Arial; color: #1155cc;  
background-color: transparent; font-weight: 400; font-style:  
normal; font-variant: normal; text-decoration: underline;  
-webkit-text-decoration-skip: none; text-decoration-skip-ink: none;  
vertical-align: baseline; white-space: pre-wrap;"> &ldquo;diesel  
death zones&rdquo;</span></a><span style="font-size: 11pt;  
font-family: Arial; color: #000000; background-color: transparent;  
font-weight: 400; font-style: normal; font-variant: normal;  
text-decoration: none; vertical-align: baseline; white-space:  
pre-wrap;"> - because asthma rates and cancer risks are so  
drastically elevated.&nbsp;</span></p>  
</li>  
<li dir="ltr" style="list-style-type: disc; font-size: 11pt;  
font-family: Arial; color: #000000; background-color: transparent;  
font-weight: 400; font-style: normal; font-variant: normal;  
text-decoration: none; vertical-align: baseline; white-space: pre;"  
aria-level="1">  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt;  
margin-bottom: 0pt;" role="presentation"><span style="font-size:  
11pt; font-family: Arial; color: #000000; background-color:  
transparent; font-weight: 400; font-style: normal; font-variant:  
normal; text-decoration: none; vertical-align: baseline;

white-space: pre-wrap;">People of color breathe disproportionate levels of this toxic air pollution, which contributes to</span><a style="text-decoration: none;" href="https://www.scientificamerican.com/article/pollution-poverty-people-color-living-industry/"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: underline; -webkit-text-decoration-skip: none; text-decoration-skip-ink: none; vertical-align: baseline; white-space: pre-wrap;"> higher rates of asthma, cancer, and other illnesses than their white counterparts</span></a><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">.</span></p></li></ul><p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p><p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">All of this environmental harm and the potentially deadly health consequences it creates is preventable through the expedient and effective electrification of trucks, which will set an invaluable and lifesaving precedent for clean fleets policymaking in other states and at the federal level.&nbsp;&nbsp;&nbsp;&nbsp;</span></p><p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">I urge CARB to fulfill its duty and create new pathways for communities to breathe the benefits of clearer air. Thank you for your time.</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 14:31:13

No Duplicates.



## **Comment 20 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Manijeh

Last Name: Berenji

Email Address: manijehberenji@gmail.com

Affiliation:

Subject: Dr. Berenji testimony

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/393-acf2022-BXVUJwFiWGcDbFQ3.docx>

Original File Name: Public Health ACF Hearing Testimony Dr. Berenji.docx

Date and Time Comment Was Submitted: 2022-10-27 14:49:37

No Duplicates.

## Comment 21 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)

First Name: Jennifer

Last Name: Goodsell

Email Address: jmgoodsell@iid.com

Affiliation: Imperial Irrigation District

Subject: IID remarks on Proposed ACF Regulation

Comment:

<p class="MsoNormal"><span style="font-size: 12.0pt; line-height: 107%;">Good afternoon, my name is Jennifer Goodsell and I am the General Services Manager at the Imperial Irrigation District. </span>IID is an irrigation district and a public power provider representing some of the most economically disadvantaged and underserved communities in the State. Our predominantly rural service territory encompasses all of Imperial County, parts of Riverside and San Diego Counties, and spans over 6,000 square miles.</p>

<p class="MsoNormal"><span style="font-size: 12.0pt; line-height: 107%;"> </span></p>

<p class="MsoNormal">IID recognizes that transportation is the single largest source of the State's greenhouse gas emissions, and achieving a zero emission medium and heavy duty fleet is critical to meeting California's environmental goals. While we support the state's goals to promote clean transportation options, and we endorse the direction that fleet electrification is headed, I am urging this board to seriously consider the unintended consequences this regulation would impose on public utilities, and our ability to deliver essential public services, especially during emergency events.</p>

<p class="MsoNormal"><span style="font-size: 12.0pt; line-height: 107%;">On September 28<sup>th</sup>, IID in conjunction with the member agencies of the Southern California Public Power Authority hosted a demonstration and round table discussion at our La Quinta facility. That event was attended by CARB Board member Riordan, CARB staffer Paul Arneja, Assemblyman Eduardo Garcia and his Chief of Staff, as well as representatives from the Assembly Utilities and Energy Committee, the Assembly Transportation Committee, the California Municipal Utilities Association and the Northern California Power Agency. We appreciate CARB's presence, and want to thank everyone who attended and made an effort to understand the unique needs of public utilities. <span style="mso-spacerun: yes;">&nbsp;</span></span></p>

<p class="MsoNormal"><span style="font-size: 12.0pt; line-height: 107%;">Our goal for this event was education, and to give the attendees an intimate look at the equipment we use, let them witness a live demonstration of real life working conditions, and experience what we mean when we talk about duty cycle and the performance requirements of a PTO, or Power Take Off System. Most of the attendees didn't know what a PTO was, or what purpose it served. </span></p>

<p class="MsoNormal"><span style="font-size: 12.0pt; line-height: 107%;">Mother Nature is a force that we cannot predict or control, and this equipment is the heart and soul of our fleets, and it is what our customers rely on in times of emergency. Whether it is a

lack of commercially available technology, exemptions an agency can't qualify for until a certain percentage of the fleet is already electrified, or the reality that the infrastructure of the California grid isn't ready for this regulation, it is respectfully requested that you fully consider the implications of your decision on public utilities and the services we provide to the residents of this state.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 14:49:19

No Duplicates.

## **Comment 22 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Rebecca

Last Name: Baskins

Email Address: rbaskins@kscsacramento.com

Affiliation: CA Advanced Biofuels Alliance

Subject: CABA Public Comment

Comment:

<p>Good Afternoon Chair Randolph and Board Members, Rebecca Baskins on behalf of CA Advanced Biofuels Alliance, the state's trade association for biodiesel and renewable diesel. While we appreciate the regulation's goals for clean transportation, we believe we need to have more flexibility for fleets, especially for those that use low-carbon, commercially and readily available fuels like renewable diesel and biodiesel blends. We also agree with many of the statements regarding feasibility that have already been stated this morning and afternoon. Furthermore, our fuels are available today, without fleet turnover - that should be used in every mode possible, to the fullest extent. We look forward to continuing working with all of you and urge you to look at all petroleum alternatives as you revise the proposed regulation. Thank you!&nbsp;</p>  
<p>&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 14:51:57

No Duplicates.

## **Comment 23 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Marc

Last Name: Narkus-Kramer

Email Address: mnarkus@verizon.net

Affiliation: San Diego 350

Subject: Support the Alternative ACF regulation scenario

Comment:

<p>I and San Diego 350 are in support of the alternative 2 that requires 100% by 2035 and lower the high priority threshold from 50 to 10.&nbsp; The REcommendation on CARB Advanced Clean Fleets Regulation from the ACF Coalition presented data on the ISOR concerning alternative 2 compared to the that of the main alternative (1).</p>

<p>The report states :&nbsp;</p>

<p>Over \$34 billion in additional health benefits</p>

<p>An additional 60% reduction in NOx and PM2.5</p>

<p>Over 2400 additional avoided premature deaths</p>

<p>A 54% greater reduction of the greenhouse gas emissions</p>

<p>Net cost savings to fleet owners increase by 2%</p>

<p>\$10 billion in additional net benefits savings, a 21% increase</p>

<p>If these numbers are correct, we should go with alternative 2</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 14:49:56

No Duplicates.

## **Comment 24 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Bob

Last Name: Shepherd

Email Address: bshepherd@quinncompany.com

Affiliation: California Caterpillar Dealers

Subject: Testimony Given 10-27-22 to the ACF

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/397-acf2022-BmdRNFcwUI5WJFQx.docx>

Original File Name: ACF Testimony - 2 min version R3.docx

Date and Time Comment Was Submitted: 2022-10-27 14:57:33

No Duplicates.

## Comment 25 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)

First Name: Margaret

Last Name: Edwards

Email Address: medwards@nsrmca.org

Affiliation: NSRMCA

Subject: Oral Comments - National Star Route Mail Contractors Association

Comment:

Thank you for the opportunity to provide comments on behalf of the National Star Route Mail Contractors Association. As the national voice for surface transportation companies that contract with the US Postal Service, the Advanced Clean Fleets rule will significantly impact HCR suppliers operating in California, will impact the transportation of mail and packages into and out of California, and could indirectly burden the entire postal surface transportation network. Compliance will require suppliers to make significant and potentially impractical changes to their operations that would have serious consequences for the interstate commerce facilitated by the United States Postal Service.

NSRMCA doesn't disagree with

NSRMCA doesn't disagree with CARB's goal of significantly reducing greenhouse gas emissions, but is concerned with the challenges that would come with the AFC as currently written. Transitioning a fleet to include zero-emission vehicles is not feasible at this time, due to the lack of commercially available vehicles, technological capability, and charging infrastructure.

NSRMCA is concerned about the viability of

Compliance is inconsistent with the duty cycle of vehicles used in transporting mail for the United States Postal Service and its network design. NSRMCA is concerned about the viability of full fleet electrification for many in-state operators. Because short-haul and regional delivery vehicles which can travel up to 300 miles in a single trip, are in near-constant use, contractors would have to significantly increase their fleet size to ensure they always have a fully charged vehicle ready to make deliveries if they could even complete a contract route on a single charge.

Additionally,

Compliance is inconsistent with the duty cycle of vehicles used in transporting mail for the United States Postal Service and its network design. Additionally, most carriers that deliver mail to or from California would be

subject to the ACF's high-priority fleet obligations &ndash; regardless of where they are located. The ACF rule unnecessarily imposes significant burdens on the interstate transportation of mail and commerce by treating all vehicles within the High Priority Fleet category equally even if they spend a de minimis amount of time within the state.

Lastly, NSRMCA notes that the ACF rule would unduly burden and may be impossible to complied with by freight brokers or logistics companies that contract with the United States Postal Service to move the mail, a growing component of the Postal Service's transportation network. The ACF rule, both its high-priority fleet and green-contracting requirements, are inconsistent with brokerage operations generally and how they support the Postal Service specifically.

NSRMCA recommends CARB establishes clear and viable exceptions to its Advanced Clean Fleet rule that will allow transportation companies to continue to use available reduced-emission fuel solutions and technologies until battery-electric power is truly viable. In the alternative, CARB should consider an amended, extended compliance timeline so that low-emission alternative fuel solutions available today can be used until battery-electric or other future solutions become viable. NSRMCA also urges the California Air Resource Board to adopt an exemption for vehicles that spend a de minimis amount of time operating in California.

Lastly, as part of our review of submitted comments, we took note of the comments submitted by the United States Postal Service. If they are granted an exemption for vehicles necessary for the maintenance of postal operations, NSRMCA asks that HCR suppliers are included, because of their essential role in transporting the mail.

For further information on NSRMCA's approach, please reference NSRMCA's complete written comments submitted on October 17, 2022. Thank you for your time.

Attachment:



Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 14:55:15

No Duplicates.

## Comment 26 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)

First Name: Heidi

Last Name: Harmon

Email Address: Heidi@greencal.org

Affiliation: Let's Green CA!

Subject: in support of CARB's alternative plan to bring more electric trucks

Comment:

<p dir="ltr" style="line-height: 1.38; margin-left: 36pt; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Hello, My name is Heidi Harmon and I am the recent former mayor of San Luis Obispo</span><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;"> now representing Let's Green CA!</span><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;"> and I'm writing today in support of CARB's alternative plan to bring more electric trucks to the road faster, and strengthen it to better address the dangerous polluting trucks on our roads, big-rigs.</span></p>  
<p><strong id="docs-internal-guid-3fb6c8dd-7fff-10e4-0286-5037c74c26d8" style="font-weight: normal;">&nbsp;</strong></p>  
<p dir="ltr" style="line-height: 1.38; margin-left: 36pt; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">California has a deadly diesel pollution problem.</span><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Freight communities, neighborhoods near warehouses and families living next highways get the worst of it. The disproportionate exposure of these mostly Black and Brown communities to diesel exhaust pollution is one of the clearest examples of environmental racism.</span></p>  
<p><strong style="font-weight: normal;">&nbsp;</strong></p>  
<p dir="ltr" style="line-height: 1.38; margin-left: 36pt; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">We need a new policy tool to cut pollution from trucks so we can save lives.</span></p>  
<p><strong style="font-weight: normal;">&nbsp;</strong></p>  
<p dir="ltr" style="line-height: 1.38; margin-left: 36pt;

margin-top: 0pt; margin-bottom: 0pt; "><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">This board can bring polluting trucks into the future and achieve environmental justice by adopting the Advanced Clean Fleet Accelerated ZEV Transition Alternative that hits 100% electric truck sales by 2036. Electric truck technology is here and strategies and funding are already in place to grow charging options to meet these reasonable and gradual goals.</span></p>  
<p><strong style="font-weight: normal;">&nbsp;</strong></p>  
<p dir="ltr" style="line-height: 1.38; margin-left: 36pt; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Your own research shows that we will achieve greater pollution reductions, save more lives, and achieve \$10 billion more in additional societal benefits by moving up the 100% electric truck sales goal by just four years. We want to bring those benefits to California. </span></p>  
<p dir="ltr" style="line-height: 1.38; margin-left: 36pt; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p>&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-left: 36pt; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">That is why I&rsquo;m calling on you, our Air Resources Board, to do your duty and take the better path that you&rsquo;ve already proposed so other states can reap the benefits of clearer air.</span></p>  
<p dir="ltr" style="line-height: 1.38; margin-left: 36pt; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-left: 36pt; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;"> Thank you for your time, Heidi Harmon </span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 15:07:59

No Duplicates.

## **Comment 27 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Colin

Last Name: Wilhelm

Email Address: colin.wilhelm@lightningemotors.com

Affiliation: Lightning eMotors

Subject: ACF adoption comments

Comment:

<p>My name is Colin Wilhelm with Lightning eMotors. I just wanted to take the time to say first thank you to the State of California and the ARB in your commitment and worldwide leadership to moving the medium and heavy duty fleet electrification equation Forward.</p>

<p class="MsoNormal">At Lightning we understand that there are public questions regarding this transition. However, our vehicles, with over 3 million miles on the road, the majority of which are California small fleets have proven that EV fleets are commercially available for small and large fleets alike.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 15:14:06

No Duplicates.

## **Comment 28 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Steven

Last Name: King

Email Address: sking@environmentcalifornia.org

Affiliation: Environment California

Subject: Supporting an accelerated timeline for 100% electric trucks

Comment:

<p>Hello, my name is Steven King and I represent Environment California as the Clean Energy Advocate. I'm speaking today in support of CARB's alternative plan to bring more electric trucks to the road faster. We're in favor of making this plan as strong as possible to better address dangerous polluting trucks on our roads throughout California.</p>

<p>On a daily basis, Californians are burdened with the most polluted air in the country. Communities near warehouses, highways and other hotspots of truck activity face the worst of this harmful pollution. Nobody in this state should have to suffer the numerous health impacts from constant exposure to diesel exhaust pollution when we have the ability to address this alarming problem through bold regulatory policy.</p>

<p>This board can bring polluting trucks into the future and achieve clean air for all by adopting an Advanced Clean Fleet Accelerated ZEV Transition Alternative that hits 100% electric truck sales by 2036 and reduces the truck threshold from 50 to 10. Electric truck technology is here today, and we already have the strategies and funding to grow charging options in order to meet this alternative's reasonable and gradual goals.&nbsp;</p>

<p>Your own research shows that we will achieve greater pollution reductions, save more lives, and achieve \$10 billion more in additional societal benefits by moving up the 100% electric truck sales goal by just four years. These benefits will meaningfully improve the lives of all Californians, especially those who live near warehouses and logistics centers who are suffering the most from rising freight emissions.</p>

<p>We're running out of time to take bold action on climate change, which is already impacting us through more frequent and intense wildfires, droughts, and heat waves. To avoid the worst global warming impacts, we need to transition our transportation sector away from dirty fossil fuels as quickly as possible. Cars and trucks are the number one source of greenhouse gas emissions in the state, so it is critical that we move up the deadline for 100% electric truck sales. Setting this bold target better reflects the pace of technological and market advancements while sending a clear signal that will prime investment for deploying clean trucks at scale. The ACF rule will provide overwhelming public health, economic, and climate benefits, and will add significant momentum to the ongoing ZEV transition.</p>

<p>That is why I respectfully call on you, Chair Randolph and members of the Air Resources Board, to do your duty and accelerate the transition to clean trucks and get more clean air benefits for the hardest-hit communities faster. Thank you for your time.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 15:20:47

No Duplicates.

## Comment 29 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)

First Name: ALFONSO

Last Name: ESQUER

Email Address: aesquer@esquer.com.mx

Affiliation: Multimodal Esquer Inc.

Subject: Zev trucks rules and coments

Comment:

<p>thanks for recieving my comments in regards with the zev trucks rule and law</p>

<p>one of the things that concern us are, the differences that a zev truck has in regards with autonomy and cost of operation</p>

<p>our core busines is serving the assembly line busines in Tijuana, B.C., and delivering and picking up loads in Los Angeles Area</p>

<p>currently, we can do that within the federal HOS od pur drivers, but because the Zev truck Class 8 only gives us 150 miles per charge, and because our load from San Diego, Ca., to Los Angeles afrea destination, and pick up location on the return load, and because o regular round trip from san diego, is about 325 miles, we need to recharge batteries twice on the trip</p>

<p>people form kenwoerth dealers tells us that we need a recharge location on route, and install a high capacity battery charger, that chage will require 3 hours</p>

<p>with that said, a regular round trip that migh require as mucho as 10.5 total hours, with the time required to recharge the truck, we will need 17.5 hours, and theres where we have the problem, because thats over the federal hours of service we have to comply with, meaning that the dirver will have to stop on route to sleep, and re-start the following day (and theres no zev sleeper truck, what they offerits a day cab, so we dont have a way to make this work.</p>

<p>also the production lines we service with loads, are acustomed for us to arribe at a certain hour, of the same day</p>

<p>so until zev trucks can do the same things a diesel truck does, we will need morte trucks and drivers that we currently use to move our current work load.</p>

<p>on the weigth capacity we currenly move, we can move up to 45,000 pounds od (payload weigth), having the zev truck +7,000-10,000 pounds heavier, it will mean that load weigth has to be reduced, and that more trucks are to be requiered to move the same ampunt of loads we currently move</p>

<p>our firm controls 100 class 8 tractors, and in total we have +150 employees</p>

<p>those positions are at risk, if our company looses efficency, and having more expensive trucks, that cost more to operate, and can work less miles per day, and move less weith per load, will make us close our doors</p>

<p>we propose that no changes are imposes on zev trucks, until those trucks can have similar autonomy on one charge of bateries, and can carry similar total weigth that the trucks we cureently operate can move</p>

<p>possibly we can move to cng engine trucks because those ones produce 3% of contaminants, that de diesel engine priduce, and allow

more development on the technologies on teh zev trucks, and the instalation of the infraestructure that will allow us to charge trucks, when they are at our terminals, with drivrs resting at home</p>

<p>&nbsp;</p>

<p>thanks and best regards</p>

<p>i will leave you with some charts, so you can better understand federal hours of serice and weigth limitations per load&nbsp;<p> when using current trucks, and moving heavy loads under current ,limits</p>

<p><img

src=" fh3TYMbs8VZ7md0NsVA1AQ/v/Bgfd u03nXPJdM+JYTyLz7/eTNfCforjBQP7/wY7382nde2P/7341j8/lzS5/FP78f9bmfxr+SFqPPHd+zIsjIjnh9HM/rOh7DjiV9c8wspHBe63DwuSGd17ckaTqHtjyL21/uJ66n+5rP63l8oNge67X/WLxdPjP4z807uyd8DapKdbK4MP7rFwAAAAAHps0fh07+nUJ8986ge5/Ht5/9Oz7v+2Pq8fhkiLL882Dz9oOE44uIOBofvHcq3upoibH5+GnUhmrvMBmzGOuLEx/z00bhbd6+G+8Pahty4nh88KEfyJ890tViavPxr/GPrzfjdlLb14hn8fmmP8XCgNcsFefV4834cODi13bLlTeOxUJHG5TNx89j8/vN+Lo6hkWzCdv8/ulQY3x492ls7qctWKcTr8YXHy10P8fj51Hb5bV6WN2M2vl2fKRtLpn2OTG0Rz/HP35YiCspqRg01TgbV1I8br8/te8245+DqtA9+jne/+bIc3H9trfiPG/H/k3jkfc6a8oNfJr/cOTuJ3w4/NvDPs6TOg8nNHrOq2xpHaOmYVpzWvTnhu2zez6lqZzqCXhuB4/j9p3glo+byXb5fvet91N6zVPzXk85dge97V/4fyp+OBuwnuy69wwIBFYVSoAAACAlFKZCg6VQS0MjsYHV97sSviIiFh4+Vi89c6b8d3//i4+OXc0Il7qSsSYrHkaK6nyeDP+NmAh6OS51+OLj16Lt872LoQciYWXj8WVj96ML947PuCJn8ThiS1j0hCrT+PTQRWpThyPT668GVfOH+vbz8LLRyJ//rX4+/8W4ov3jsfJiDj5yksHHcweJL3GR+P8uYRv/u+zLdiedl6rK6/GycQHPIl/pbV9z9TPiUGOxsmE6hq3/y8tVVxSEGdD09KaS/5+5fX4YFDVknFVZplG/I+p1V9ii78Tr8bbKUnY65KmeeUgY0nNHDMLaZvXpjw3zFqazqHOMb3zZnwXoDrR7K8fa6T+PJ5Ube/i2n8k3vpt8usxaG7YvL2ZmAisKhUAAABAekmmgkPl1/hvUvWcE8civ2syx9aiwHdTrQ4wT2MlTQalyIhZr8ff3zm297fJz742eAHSzp0o9flw9rE6aEm4nh88tFre4xjy8LZraSqv6fx2+9J7VdOHUy3/3gsYfF0P23BrVDyQvw5sR1ZxH9+SefC9PTPich+8KEbE89HP8ff0rCon6Y4G8XLx+Ktj34XnwyIy4fVzZHeo933Ncn4H0erv+TKHiff3DvOZypN88o+xpKmOWYWUjuvTXNumLU0nUPbFs6fGpDwk6LrR4e50o/HGduTuvafXUH+/x/9HP/oS/B7Gv9ITGRTLQoAAAAGzSRTwWHy+Hn8J+nnJ6bUqmgU8zRW0uPxZnw9oEXGJyO0/Bi8APYkvu5dHJ15rA5agIk4/97hSCpMWuA7+eaxWHj5WPwh4X16ePfPRCuCLLWYLEWjWZxTgz0LP4byQv



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Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 14:59:50

No Duplicates.

## **Comment 30 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: James

Last Name: Fahy

Email Address: james.fahy@mercedes-benz.com

Affiliation: Mercedes-Benz

Subject: Mercedes-Benz Testimony on Proposed Advanced Clean Fleets Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/403-acf2022-BWgFZgZ1U2MDYFQw.pdf>

Original File Name: Mercedes-Benz Advanced Clean Fleets Testimony 20221027.pdf

Date and Time Comment Was Submitted: 2022-10-27 15:27:55

No Duplicates.

## Comment 31 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)

First Name: Ryan

Last Name: Gallentine

Email Address: rgallentine@aee.net

Affiliation:

Subject: AEE supports ACF Alternative 2

Comment:

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```

-webkit- -mode: normal !important;">Randolph </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">and Board Members</span></span><span class="EOP SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; -webkit- -mode: normal !important;" data-ccp-props="{"201341983":0,"335559739":160,"335559740":":259"}">&nbsp;</span></p></li><li class="OutlineElement Ltr SCXW256672765 BCX4" style="margin: 0px 0px 0px 24px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; overflow: visible; cursor: text; clear: both; position: relative; direction: ltr; display: block; font-size: 11pt; font-family: Calibri, Calibri\_MSFontService, sans-serif; vertical-align: baseline;" role="listitem" data-leveltext="&#61623;" data-font="Symbol" data-listid="1" data-list-defn-props="{"335552541":1,"335559684":-2,"335559685":720,"335559991":360,"469769226":&q uot;Symbol","469769242":[8226],"469777803":"left","469777804":"&#61623;","469777815":"hybridMultilevel"}" aria-setsize="-1" data-aria-posinset="2" data-aria-level="1"><p class="Paragraph SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; overflow-wrap: break-word; white-space: pre-wrap; vertical-align: baseline; -webkit- -mode: normal !important;"><span class="TextRun SCXW256672765 BCX4" lang="EN-US" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; font-variant-ligatures: none !important; -webkit- -mode: normal !important;" xml:lang="EN-US" data-contrast="auto"><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">My name is Ryan Gallentine</span></span><span class="TextRun SCXW256672765 BCX4" lang="EN-US" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; font-variant-ligatures: none !important; -webkit- -mode: normal !important;" xml:lang="EN-US" data-contrast="auto"><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">and I&rsquo;m here </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">representing</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">Advanced Energy Economy</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">to express our s</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">trong s</span><span class="NormalTextRun SCXW256672765

BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">upport for the </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">Advanced Clean Fleets rule</span></span><span class="EOP SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; -webkit-nspace-mode: normal !important;">data-ccp-props="{ "201341983":0, "335559739":160, "335559740&quot;:259}">&nbsp;</span></p></li><li class="OutlineElement Ltr SCXW256672765 BCX4" style="margin: 0px 0px 0px 24px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; overflow: visible; cursor: text; clear: both; position: relative; direction: ltr; display: block; font-size: 11pt; font-family: Calibri, Calibri\_MSFontService, sans-serif; vertical-align: baseline;" role="listitem" data-leveltext="&#61623;" data-font="Symbol" data-listid="1" data-list-defn-props="{ "335552541":1, "335559684":-2, "335559685":720, "335559991":360, "469769226":&quot;Symbol", "469769242":[8226], "469777803":&quot;left", "469777804":&#61623;", "469777815":&quot;hybridMultilevel"}" aria-setsize="-1" data-aria-posinset="3" data-aria-level="1"><p class="Paragraph SCXW256672765 BCX4" lang="EN-US" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; overflow-wrap: break-word; white-space: pre-wrap; vertical-align: baseline; -webkit-nspace-mode: normal !important;" xml:lang="EN-US"><span class="TextRun SCXW256672765 BCX4" lang="EN-US" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; font-variant-ligatures: none !important; -webkit-nspace-mode: normal !important;" xml:lang="EN-US" data-contrast="auto"><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">AEE is</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;"> a national association of businesses</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;"> representing the broad spectrum of advanced energy and electrified transportation</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">olutions</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">.</span></span><span class="EOP SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; -webkit-nspace-mode: normal !important;" data-ccp-



props="{\"201341983\":0,\"335559739\":160,\"335559740\">:259}>&nbsp;</span></p></li><li class=\"OutlineElement Ltr SCXW256672765 BCX4\" style=\"margin: 0px 0px 0px 24px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; overflow: visible; cursor: text; clear: both; position: relative; direction: ltr; display: block; font-size: 11pt; font-family: Calibri, Calibri\_MSFontService, sans-serif; vertical-align: baseline;\" role=\"listitem\" data-leveltext=\"&#61623;\" data-font=\"Symbol\" data-listid=\"1\" data-list-defn-props=\"{\"335552541\":1,\"335559684\":-2,\"335559685\":720,\"335559991\":360,\"469769226\":&quot;Symbol\",&quot;469769242\":[8226],&quot;469777803\":&quot;left\",&quot;469777804\":&quot;&#61623;\",&quot;469777815\":&quot;hybridMultilevel\"}\" aria-setsize=\"-1\" data-aria-posinset=\"4\" data-aria-level=\"1\"><p class=\"Paragraph SCXW256672765 BCX4\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; overflow-wrap: break-word; white-space: pre-wrap; vertical-align: baseline; -webkit-nspace-mode: normal !important;\"><span class=\"TextRun SCXW256672765 BCX4\" lang=\"EN-US\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; font-variant-ligatures: none !important; -webkit-nspace-mode: normal !important;\" xml:lang=\"EN-US\" data-contrast=\"auto\"><span class=\"NormalTextRun SCXW256672765 BCX4\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;\">It is from the perspective of </span><span class=\"NormalTextRun SCXW256672765 BCX4\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;\">these diverse </span><span class=\"NormalTextRun SCXW256672765 BCX4\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;\">members</span></span><span class=\"TrackChangeTextDeletionMarker TrackedChange SCXW256672765 BCX4\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; color: #881798; -webkit-nspace-mode: normal !important;\"><span class=\"TextRun SCXW256672765 BCX4\" lang=\"EN-US\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; font-variant-ligatures: none !important; -webkit-nspace-mode: normal !important;\" xml:lang=\"EN-US\" data-contrast=\"auto\"><span class=\"NormalTextRun TrackChangeTextDeletion SCXW256672765 BCX4\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; text-decoration: line-through; -webkit-nspace-mode: normal !important;\"> </span></span><span class=\"TextRun SCXW256672765 BCX4\" lang=\"EN-US\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; font-variant-ligatures: none !important; -webkit-nspace-mode: normal !important;\" xml:lang=\"EN-US\" data-contrast=\"auto\"><span class=\"NormalTextRun SCXW256672765 BCX4\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;\">&nbsp;&nbsp;&nbsp;that</span><span class=\"NormalTextRun SCXW256672765 BCX4\" style=\"margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;\"> </span><span

class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">we

class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;"></span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">encourage

class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">CARB to adopt

</span></span><span class="TextRun SCXW256672765 BCX4" lang="EN-US" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; font-weight: bold; font-variant-ligatures: none !important; -webkit-nspace-mode: normal !important;" xml:lang="EN-US" data-contrast="auto"><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">Alternative 2</span></span><span class="TextRun SCXW256672765 BCX4" lang="EN-US" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; font-variant-ligatures: none !important; -webkit-nspace-mode: normal !important;" xml:lang="EN-US" data-contrast="auto"><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">requiring

class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">all-electric

class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">medium- and heavy-duty vehicle sales

class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">by 2036

class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">.

</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">&nbsp;

</span></span><span class="EOP SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; -webkit-nspace-mode: normal !important;" data-ccp-props="{"201341983":0,"335559739":160,"335559740":259}">&nbsp;

</li>

</ul>

</div>

</div>

<div class="SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; caret-color: rgba(0, 0, 0, 0.847); color: rgba(0, 0, 0, 0.847); font-family: Calibri, Calibri\_MSFontService, sans-serif; font-size:

```
14.666667px;">
<div class="ListContainerWrapper SCXW256672765 BCX4" style="margin:
0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag:
none; position: relative;">
<ul class="BulletListStyle1 SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
overflow: visible; cursor: text; font-family: verdana;"
role="list">
<li class="OutlineElement Ltr SCXW256672765 BCX4" style="margin:
0px 0px 0px 24px; padding: 0px; -webkit-user-select: text;
-webkit-user-drag: none; overflow: visible; cursor: text; clear:
both; position: relative; direction: ltr; display: block;
font-size: 11pt; font-family: Calibri, Calibri_MSFontService,
sans-serif; vertical-align: baseline;" role="listitem"
data-leveltext="¶" data-font="Symbol" data-listid="1"
data-list-defn-props="{\"335552541\":1,\"335559684\":-
2,\"335559685\":720,\"335559991\":360,\"469769226\":&q
uot;Symbol\", \"469769242\":[8226], \"469777803\": \"left
\", \"469777804\": \"¶\", \"469777815\": \"
hybridMultilevel\"}"
aria-setsize="-1" data-aria-posinset="1" data-aria-level="1">
<p class="Paragraph SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
overflow-wrap: break-word; white-space: pre-wrap; vertical-align:
baseline; -webkit-nspace-mode: normal !important;"><span
class="TextRun SCXW256672765 BCX4" lang="EN-US" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
font-size: 11pt; line-height: 18.345833px; font-family: Calibri,
Calibri_EmbeddedFont, Calibri_MSFontService, sans-serif;
font-variant-ligatures: none !important; -webkit-nspace-mode: normal
!important;" xml:lang="EN-US" data-contrast="auto"><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">A</span><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">n assertive,</span><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">&nbsp;</span><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">accelerated
timeline</span><span class="NormalTextRun SCXW256672765 BCX4"
style="margin: 0px; padding: 0px; -webkit-user-select: text;
-webkit-user-drag: none; -webkit-nspace-mode: normal !important;">
</span><span class="NormalTextRun SCXW256672765 BCX4"
style="margin: 0px; padding: 0px; -webkit-user-select: text;
-webkit-user-drag: none; -webkit-nspace-mode: normal !important;">for
e</span><span class="NormalTextRun SCXW256672765 BCX4"
style="margin: 0px; padding: 0px; -webkit-user-select: text;
-webkit-user-drag: none; -webkit-nspace-mode: normal
!important;">lectrifying&nbsp;</span><span class="NormalTextRun
SCXW256672765 BCX4" style="margin: 0px; padding: 0px;
-webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">medium- and
heavy-duty</span><span class="NormalTextRun SCXW256672765 BCX4"
style="margin: 0px; padding: 0px; -webkit-user-select: text;
-webkit-user-drag: none; -webkit-nspace-mode: normal !important;">
vehicle fleets</span><span class="NormalTextRun SCXW256672765 BCX4"
style="margin: 0px; padding: 0px; -webkit-user-select: text;
-webkit-user-drag: none; -webkit-nspace-mode: normal
```

!important;">&nbsp;</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">will </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">stimulate new economic growth</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">, maximize emissions reductions,</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">&nbsp;</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">and</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;"></span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">propel CA&rsquo;s c</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">ompetitive</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;"></span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">ZEVE</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">manufacturin</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">g</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">industry</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nsbp-mode: normal !important;">.</span></span><span class="EOP SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; -webkit-nsbp-mode: normal !important;" data-cpp-props="{"201341983":0,"335559739":160,"335559740&quot;:259}">&nbsp;</span></p></li><li class="OutlineElement Ltr SCXW256672765 BCX4" style="margin: 0px 0px 0px 24px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; overflow: visible; cursor: text; clear: both; position: relative; direction: ltr; display: block; font-size: 11pt; font-family: Calibri, Calibri\_MSFontService, sans-serif; vertical-align: baseline;" role="listitem" data-leveltext="#61623;" data-font="Symbol" data-listid="1" data-list-defn-props="{"335552541":1,"335559684":-2,"335559685":720,"335559991":360,"469769226":&q

uot;Symbol", "469769242": [8226], "469777803": "left", "469777804": "&#61623;", "469777815": "hybridMultilevel"}" aria-setsize="-1" data-aria-posinset="2" data-aria-level="1">

<span class="TextRun SCXW256672765 BCX4" lang="EN-US" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; font-variant-ligatures: none !important; -webkit-nspace-mode: normal !important;" xml:lang="EN-US" data-contrast="auto"><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">W</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">e </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">also </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">appreciate the complexity of </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">implementing this rule</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">, and recognize th</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">e</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">balancing act required </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">to</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;"> </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">rapid</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">ly and </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">cost-effective</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">ly</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">electrif</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-nspace-mode: normal !important;">

padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-  
nbsp-mode: normal !important; "y </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-  
nbsp-mode: normal !important; ">the </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-  
nbsp-mode: normal !important; ">MHD sector</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-  
nbsp-mode: normal !important; ">.</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-  
nbsp-mode: normal !important; "> </span></span><span class="EOP SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; -webkit-  
nbsp-mode: normal !important; " data-ccp-props="{ "134233117": false, "134233118": false, "201341983": 0, "335551550": 1, "335551620": 1, "335559685": "720, "335559737": 0, "335559738": 0, "335559739": 160, "335559740": 259, "335559991": 360 } ">&nbsp;</span></p></li>  
<li class="OutlineElement Ltr SCXW256672765 BCX4" style="margin: 0px 0px 0px 24px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; overflow: visible; cursor: text; clear: both; position: relative; direction: ltr; display: block; font-size: 11pt; font-family: Calibri, Calibri\_MSFontService, sans-serif; vertical-align: baseline; " role="listitem" data-leveltext="#61623; " data-font="Symbol" data-listid="1" data-list-defn-props="{ "335552541": 1, "335559684": -2, "335559685": 720, "335559991": 360, "469769226": "uot;Symbol", "469769242": [8226], "469777803": "left", "469777804": "&#61623; ", "469777815": "hybridMultilevel" } " aria-setsize="-1" data-aria-posinset="3" data-aria-level="1">  
<p class="Paragraph SCXW256672765 BCX4" lang="EN-US" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; overflow-wrap: break-word; white-space: pre-wrap; vertical-align: baseline; -webkit-  
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nbsp-mode: normal !important; " xml:lang="EN-US" data-contrast="auto"><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-  
nbsp-mode: normal !important; ">Vehicle availability, supply chain constraints, and other factors outside</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-  
nbsp-mode: normal !important; "> fleet operators&rsquo;</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit-  
nbsp-mode: normal !important; "> control will need to be </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;

-webkit- -mode: normal !important;">tackled </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">holistically</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">&nbsp;</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">and </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">in tandem with</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">&nbsp;</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">distribution system upgrades</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">>,</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">financial assistance,</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">and </span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">other</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">planning</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">considerations</span><span class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; -webkit- -mode: normal !important;">>.</span></span><span class="EOP SCXW256672765 BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px; font-family: Calibri, Calibri\_EmbeddedFont, Calibri\_MSFontService, sans-serif; -webkit- -mode: normal !important;"></span></p></li><li class="OutlineElement Ltr SCXW256672765 BCX4" style="margin: 0px 0px 0px 24px; padding: 0px; -webkit-user-select: text; -webkit-user-drag: none; overflow: visible; cursor: text; clear: both; position: relative; direction: ltr; display: block; font-size: 11pt; font-family: Calibri, Calibri\_MSFontService, sans-serif; vertical-align: baseline;" role="listitem" data-leveltext="¶1623;" data-font="Symbol" data-listid="1" data-list-defn-props="{"335552541":1,"335559684":-2,"335559685":720,"335559991":360,"469769226":&q uot;Symbol","469769242":[8226],"469777803":"left

","469777804": "&#61623;","469777815": "hybridMultilevel"}" aria-setsize="-1" data-aria-posinset="4" data-aria-level="1">  
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</li>
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</div>
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Calibri, Calibri_MSFontService, sans-serif; font-size:
14.666667px;">
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none; position: relative;">
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both; position: relative; direction: ltr; display: block;
font-size: 11pt; font-family: Calibri, Calibri_MSFontService,
sans-serif; vertical-align: baseline;" role="listitem"
data-leveltext="#61623;" data-font="Symbol" data-listid="1"
data-list-defn-props="{\"335552541\":1,\"335559684\":-
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uot;Symbol\", \"469769242\":[8226], \"469777803\":"left
\", \"469777804\":"#61623;\", \"469777815\":"
hybridMultilevel\"}"
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overflow-wrap: break-word; white-space: pre-wrap; vertical-align:
baseline; -webkit-nspace-mode: normal !important;"><span
class="TextRun SCXW256672765 BCX4" lang="EN-US" style="margin: 0px;
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Calibri_EmbeddedFont, Calibri_MSFontService, sans-serif;
font-variant-ligatures: none !important; -webkit-nspace-mode: normal
!important;" xml:lang="EN-US" data-contrast="auto"><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">These </span><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">recommendations</span><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;"> </span><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">and others </span><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">outlined in our written
comments</span><span class="NormalTextRun SCXW256672765 BCX4"
style="margin: 0px; padding: 0px; -webkit-user-select: text;
-webkit-user-drag: none; -webkit-nspace-mode: normal !important;">
</span><span class="NormalTextRun SCXW256672765 BCX4"
style="margin: 0px; padding: 0px; -webkit-user-select: text;
-webkit-user-drag: none; -webkit-nspace-mode: normal
!important;">will provid</span><span class="NormalTextRun
SCXW256672765 BCX4" style="margin: 0px; padding: 0px;

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-webkit-user-select: text; -webkit-user-drag: none;  
-webkit-nbsp-mode: normal !important;">e</span><span  
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;  
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;  
-webkit-nbsp-mode: normal !important;"> reasonable</span><span  
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;  
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;  
-webkit-nbsp-mode: normal !important;"> flexibility as the market  
continues to evolve while preserving a clear market signal and  
</span><span class="NormalTextRun SCXW256672765 BCX4"  
style="margin: 0px; padding: 0px; -webkit-user-select: text;  
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BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text;  
-webkit-user-drag: none; -webkit-nbsp-mode: normal !important;">ing  
California</span><span class="NormalTextRun SCXW256672765 BCX4"  
style="margin: 0px; padding: 0px; -webkit-user-select: text;  
-webkit-user-drag: none; -webkit-nbsp-mode: normal !important;"> on  
</span><span class="NormalTextRun SCXW256672765 BCX4"  
style="margin: 0px; padding: 0px; -webkit-user-select: text;  
-webkit-user-drag: none; -webkit-nbsp-mode: normal  
!important;">track </span><span class="NormalTextRun SCXW256672765  
BCX4" style="margin: 0px; padding: 0px; -webkit-user-select: text;  
-webkit-user-drag: none; -webkit-nbsp-mode: normal !important;">to  
meet the</span><span class="NormalTextRun SCXW256672765 BCX4"  
style="margin: 0px; padding: 0px; -webkit-user-select: text;  
-webkit-user-drag: none; -webkit-nbsp-mode: normal !important;">  
aggressive goals enshrined in </span><span class="NormalTextRun  
SCXW256672765 BCX4" style="margin: 0px; padding: 0px;  
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SCXW256672765 BCX4" style="margin: 0px; padding: 0px;  
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-webkit-nbsp-mode: normal !important;">O</span><span  
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-webkit-nbsp-mode: normal !important;">rder. </span></span><span  
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-webkit-nbsp-mode: normal !important;"  
data-ccp-  
props="{\"134233117\":false,\"134233118\":false,\"20134198  
3\":0,\"335551550\":1,\"335551620\":1,\"335559685\"<br>  
;:720,\"335559737\":0,\"335559738\":0,\"335559739\":16  
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rgba(0, 0, 0, 0.847); color: rgba(0, 0, 0, 0.847); font-family:  
Calibri, Calibri\_MSFontService, sans-serif; font-size:

```
14.666667px;">
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0px; padding: 0px; -webkit-user-select: text; -webkit-user-drag:
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overflow: visible; cursor: text; font-family: verdana;"
role="list">
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-webkit-user-drag: none; overflow: visible; cursor: text; clear:
both; position: relative; direction: ltr; display: block;
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sans-serif; vertical-align: baseline;" role="listitem"
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!important;" xml:lang="EN-US" data-contrast="auto"><span
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-webkit-nspace-mode: normal !important;">AEE</span><span
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-webkit-nspace-mode: normal !important;">&nbsp;</span><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">look</span><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;">s</span><span
class="NormalTextRun SCXW256672765 BCX4" style="margin: 0px;
padding: 0px; -webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;"> forward to working with
CARB and other stakeholders to</span><span class="NormalTextRun
SCXW256672765 BCX4" style="margin: 0px; padding: 0px;
-webkit-user-select: text; -webkit-user-drag: none;
-webkit-nspace-mode: normal !important;"> cement an ambitious,
achievable ACF rule. </span></span><span class="EOP SCXW256672765
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-webkit-user-drag: none; font-size: 11pt; line-height: 18.345833px;
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;:259}">&nbsp;</span></p>
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-10-27 15:45:14

No Duplicates.

## **Comment 32 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Alison

Last Name: Kerstetter

Email Address: akerstetter@cityofsacramento.org

Affiliation: City of Sacramento

Subject: City of Sacramento Comments on ACF Regulation

Comment:

<p>Please see the attached comments from the City of Sacramento on the Advanced Clean Fleets Regulation.&nbsp;</p>

<p>&nbsp;</p>

<p>Thank you,&nbsp;</p>

<p>Alison Kerstetter</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/405-acf2022-BmUGYQFyVmcEXQVm.pdf>

Original File Name: CARB comment letter\_10272022.pdf

Date and Time Comment Was Submitted: 2022-10-27 15:57:58

No Duplicates.

### **Comment 33 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Linda

Last Name: Hutchins-Knowles

Email Address: lindahk123@mac.com

Affiliation: Mothers Out Front California

Subject: CA mothers and allies urge approval of ACF rule without delay

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1350-acf2022-B2pROFI1BAhXMlc2.pdf>

Original File Name: MOF CA Letter to CARB in support of Advanced Clean Fleets rule 2023.04.27 (no logos).pdf

Date and Time Comment Was Submitted: 2023-04-27 07:41:03

No Duplicates.

## **Comment 34 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Linda

Last Name: Hutchins-Knowles

Email Address: linda.hutchins-knowles@acterra.org

Affiliation: EV Charging for All Coalition (EVCAC)

Subject: Transportation electrification advocates urge approval of ACF rule without delay  
Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1351-acf2022-UjFdOlwvU2IAWQNi.pdf>

Original File Name: CARB ACF Transportation Electification Coalition Letter (no logos).pdf

Date and Time Comment Was Submitted: 2023-04-27 07:41:03

No Duplicates.

## **Comment 35 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: William

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association

Subject: Health community support for ACF and Locomotive Standards

Comment:

Please see attached letter on behalf of dozens of California health and medical organization and health professionals in support of CARB actions to reduce emissions through the ACF and In-Use Locomotive Standards.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1352-acf2022-AGhdPl09Um0KeAhg.pdf>

Original File Name: Health Letter to CARB re ACF\_Locomotives\_4.27.23.pdf

Date and Time Comment Was Submitted: 2023-04-27 07:43:06

No Duplicates.



## **Comment 36 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Elisabeth

Last Name: de Jong

Email Address: edejong@scppa.org

Affiliation: SCPPA

Subject: Public Agency General Managers Letter to CARB RE: ACF

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1354-acf2022-VTIBalcJWUDagFs.pdf>

Original File Name: GM Comment Letter on ACF April 2023\_GMSignatures\_4.24.23.pdf

Date and Time Comment Was Submitted: 2023-04-27 08:01:54

No Duplicates.

## **Comment 37 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Robert

Last Name: Ennis

Email Address: [rennis@riversideca.gov](mailto:rennis@riversideca.gov)

Affiliation: Legislative Manger, Riverside Pub. Util.

Subject: Riverside Public Utility Comments on 15-Day Proposed Advanced Clean Fleets

Language

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1355-acf2022-WykBd1MnUl4Lbgdo.pdf>

Original File Name: RPU Comments on 15-Day Proposed Advanced Clean Fleets Language.pdf

Date and Time Comment Was Submitted: 2023-04-27 08:02:09

No Duplicates.

## **Comment 38 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: frank

Last Name: harris

Email Address: Non-web submitted comment

Affiliation:

Subject: Written Comment

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1356-acf2022-VjBdKVMzU24AbQhg.pdf>

Original File Name: frankharris.pdf

Date and Time Comment Was Submitted: 2023-04-27 08:12:20

No Duplicates.

## **Comment 39 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Emily

Last Name: Navarro

Email Address: emilynavarrocisheros@gmail.com

Affiliation:

Subject: Written Comment

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1359-acf2022-B28GcVB8VjUDN1d6.pdf>

Original File Name: HQ-02-BW465A@arb.ca.gov\_20230427\_112413.pdf

Date and Time Comment Was Submitted: 2023-04-27 08:49:15

No Duplicates.

## **Comment 40 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Todd

Last Name: Clark

Email Address: todd.clark.snyder@gmail.com

Affiliation:

Subject: Written Comment

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1360-acf2022-UDZRIFULBQIRNgFi.pdf>

Original File Name: FW\_ ACF rule.pdf

Date and Time Comment Was Submitted: 2023-04-27 09:31:06

No Duplicates.

## **Comment 41 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Manuel  
Last Name: Cunha, Jr.  
Email Address: mcunha@niseifarmersleague.com  
Affiliation: Nisei Farmers League

Subject: Proposed Advanced Clean Fleets Regulation  
Comment:

April 26, 2023  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Proposed Advanced Clean Fleet Regulation Comments

Dear Chair Randolph and Board Members,

The Nisei Farmers League is a non-profit organization representing over 500 members. These members are growers, farm workers, packers, processors and farm labor contractors. Trucking is a huge part of growers getting their product to market. Many of the trucks necessary to carry out goods-movement equipment may not be available in a timely manner to achieve zero-emission vehicles (ZEV) being proposed.

The rapid conversion requirements necessary may not be available by manufacturers who must achieve these goals. Our members are already experiencing wait times ranging from 6 months to 18 months.

This has caused considerable damage to their normal operations. Additionally, not only are vehicles and equipment on delay, but replacement parts, tractors, etc. are also experiencing wait times.

This adds to more problems of products getting to market in a timely manner.

Mandatory power shutoffs in various parts of California have made a lack of available energy to power the grid. In addition, we transport goods to numerous states. We do not know if other states will have powering stations available to charge our electric fleets. Do we have the assurance that we can leave Reedley, California headed to New York and be able to accomplish that? We must have assurances that power will be available throughout the United States by 2035 before converting over to zero emission vehicles. Our food reliability depends on it.

Sincerely,  
Manuel Cunha, Jr.  
President

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1361-acf2022-VzQFbFY6BDpVNgZo.docx>

Original File Name: Comment Letter submitted 4-27-23.docx

Date and Time Comment Was Submitted: 2023-04-27 09:44:54

No Duplicates.



## **Comment 42 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Marcos

Last Name: Luna

Email Address: marcos.luna@cleanenergyfuels.com

Affiliation: clean energy fuels

Subject: ACT Comment

Comment:

At this moment, there is no data that indicates we are ready to transition our transportation into zero emissions. There are no case studies that indicate the financial or feasible ease of small carriers to transition their fleets into ZEVs. Currently, our infrastructure is not ready to take on the weight of ZEVs at the proposed scale. The market offerings from the OEMs do not currently meet industry standards for duty cycles. I caution you against going about this in haste, there will be significant damage to small carriers that are for the most part owned by marginalized people living and contributing to the economy of neighborhoods with high unemployment rates and low standards of living. If we look at this as a social justice issue, we should take an approach that gains us the best benefit both for the environment and the material conditions of the citizens in the area.

The North American Council for Freight Efficiency has published their findings after years of research and they advise that the road to zero emissions will require the use of bridge technologies like Renewable Natural Gas. At this moment, the use of RNG can provide a carbon capture solution that can take us from the dirty Diesel exhaust fumes and deliver us to zero tail pipe emissions in due time while being 90% cleaner than Diesel and providing a Carbon Intensity level of -300.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 10:11:25

No Duplicates.



## **Comment 43 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Jessica

Last Name: Fleming

Email Address: jesselfleming@gmail.com

Affiliation:

Subject: Vote YES on Advanced Clean Fleets Regulation

Comment:

Clean energy is not only the future; it is the only way to protect communities across the world from further health and safety hazards. Please vote yes on this proposal to take the next step on providing clean air for these communities, especially the most vulnerable, and please go further to ensure that zero emissions becomes the standard as soon as possible.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 10:14:04

No Duplicates.

## **Comment 44 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Marcos

Last Name: luna

Email Address: marcos.luna@cleanenergyfuels.com

Affiliation: clean energy fuels

Subject: Comment on ACF

Comment:

At this moment, there is no data that indicates we are ready to transition our transportation into zero emissions. There are no case studies that indicate the financial or feasible ease of small carriers to transition their fleets into ZEVs. Currently, our infrastructure is not ready to take on the weight of ZEVs at the proposed scale. The market offerings from the OEMs do not currently meet industry standards for duty cycles. I caution you against going about this in haste, there will be significant damage to small carriers that are for the most part owned by marginalized people living and contributing to the economy of neighborhoods with high unemployment rates and low standards of living. If we look at this as a social justice issue, we should take an approach that gains us the best benefit both for the environment and the material conditions of the citizens in the area.

The North American Council for Freight Efficiency has published their findings after years of research and they advise that the road to zero emissions will require the use of bridge technologies like Renewable Natural Gas. At this moment, the use of RNG can provide a carbon capture solution that can take us from the dirty Diesel exhaust fumes and deliver us to zero tail pipe emissions in due time while being 90% cleaner than Diesel and providing a Carbon Intensity level going below zero.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 10:16:53

No Duplicates.

## **Comment 45 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Steve

Last Name: Wopschall

Email Address: steve.wopschall@gmail.com

Affiliation:

Subject: Asthma Patient who OPPOSES ACF Regulation

Comment:

To: CARB

Re: ACF Regulation

I am an asthma patient who is concerned about air quality. However, I am also a retired Firefighter/EMT and Community Service Officer with some relevant knowledge about fleet vehicle management and our power grid. I maintain friendships of people who are currently fleet managers both private and public. I also have friends who work in various fields of electrical energy production, distribution, storage, and research. And I live in an area of California that frequently has power outages caused by public safety shutdowns, high winds, storms, and fires. I do not believe that the goals and timelines in this regulation are achievable, advisable, or safe.

No amount of wishing for the goals and timelines mandated in this regulation will make them achievable. This regulation will have severe detrimental consequences for our state and country. The safety of our residents will be harmed by this regulation.

I do believe that EV make sense for some applications. IF our electrical grid can become much more robust and stable, then the roles of EV can increase. Please, for the good of our country, do NOT mandate something that is not achievable within the deadlines of this regulation.

I oppose this regulation and ask that you do not approve this regulation.

Sincerely,

Steve Wopschall  
Redding, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 10:37:06

No Duplicates.

## **Comment 46 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Cittalli

Last Name: Islas

Email Address: cislal2023@gmail.com

Affiliation:

Subject: Written Comment

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1366-acf2022-UTJXOAZzAD9SNQll.pdf>

Original File Name: Citlalli Islas.pdf

Date and Time Comment Was Submitted: 2023-04-27 11:13:29

No Duplicates.

## **Comment 47 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: alexa

Last Name: moran

Email Address: alexamoran1977@gmail.com

Affiliation:

Subject: Written Comment

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1367-acf2022-UzFXOAdhAg4LflQ9.pdf>

Original File Name: big sister.pdf

Date and Time Comment Was Submitted: 2023-04-27 11:13:29

No Duplicates.

## **Comment 48 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: kristie

Last Name: Eglsauer

Email Address: kristie.eglsaer@gmail.com

Affiliation:

Subject: Written Comment

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1368-acf2022-UTddLFIMWFQCYQRq.pdf>

Original File Name: FW\_ Encourage Advanced Clean Fleets to Also Be Safer.pdf

Date and Time Comment Was Submitted: 2023-04-27 11:23:15

No Duplicates.

## **Comment 49 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Linda

Last Name: Hutchins-Knowles

Email Address: norcalmothersoutfront@gmail.com

Affiliation: Mothers Out Front California

Subject: Listen to the voices of frontline youth like Rhian, whose op-ed the Mercury News ran today

Comment:

Please take a minute to read this powerful op-ed by a 19-year-old Black student from Vallejo who urges you to move with all urgency and ambition to adopt the ACT without delay or dilution or carve outs. Thank you for listening to and centering the needs of our most vulnerable communities whose lives are being cut short by pollution from heavy trucks in their neighborhoods. Read the op-ed here in today's Mercury News: <https://wp.me/p7ShJJ-Fqhu>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 11:31:12

No Duplicates.

## **Comment 50 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: John

Last Name: Lormon

Email Address: john.lormon@procopio.com

Affiliation: Procopio

Subject: ACF Comment Letter

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1370-acf2022-VjUBaFwwBzkDYAln.pdf>

Original File Name: Comment Letter.pdf

Date and Time Comment Was Submitted: 2023-04-27 11:47:20

No Duplicates.



## **Comment 51 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Ed

Last Name: Ward

Email Address: ed.ward@vpps.net

Affiliation:

Subject: Request to not approve the ACF Rule

Comment:

My Name is Ed Ward I am asking for your no-vote regarding to Advanced Clean Fleets.

I believe we are obligated to leave this planet better than we found it.

I applaud the uncelebrated gains in air quality we have achieved in California.

The extreme compliance schedule and the bet that our electrical infrastructure will catch up are unrealistic.

There are over 8 exemptions built into this proposal designed to offload responsibility for nonperformance to truck owners. CARB, Utilities, and Municipalities face no penalties for these extreme goals.

Technology to deliver cleaner tailpipe emissions is changing rapidly. The cost difference between an internal combustion engine truck and a ZEV truck equivalent can be over a quarter million dollars. The measure should be emissions, not age.

The ACF program violates the trust of our most impacted communities. Many of our small fleet owners come from these communities. When extreme deadlines are not met, who will explain to these communities what happened?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 11:47:00

No Duplicates.

## **Comment 52 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Derrick

Last Name: Robinson

Email Address: derrick@cpisandiego.org

Affiliation: Center on Policy Initiatives

Subject: Support CARB ACF rulemaking

Comment:

Today, I am here in support of the Advanced Clean Fleets rule, and asking CARB to vote unanimously in support of the standard. This vote will help to end the negative impacts caused by diesel trucks that emit harmful gasses in our communities by transitioning to zero emission truck fleets and protect truck drivers.

A yes vote will help our impacted community members in San Diego live longer, healthier lives, especially low income communities and our communities of color located near ports and other places where diesel trucks are frequently concentrated, leaving behind smog and other harmful greenhouse gasses.

Fleet and truck owners who transition will also be able to save money by lowering fuel and maintenance costs associated with diesel trucks while also helping to protect our communities that have already experienced significant negative health impacts to its residents. Investments into zero emission trucks and infrastructure is already underway and helping to support high road jobs in our communities.

A yes vote will also help to protect truck drivers by providing the much needed worker protections that prevent drivers from exploitive practices that have plagued the industry for generations. This rule will help end the practice of worker misclassification that has allowed many companies to wrongfully hold back protections and benefits to workers in order to increase profits.

CARB also needs to direct staff to develop the Advanced Clean Trucks 2 sales rule by 2026 and direct staff to find more ways to reduce pollution and protect workers who are not protected under the Advance Clean Fleets rule.

Good work has been done so far by CARB to define and regulate "controlling companies" in the ACF rule. However, loopholes still exist that allow businesses that operate 10 to 50 trucks to misclassify drivers as independent contractors in the California for-hire trucking industry.

Lowering the fleet threshold from 50 to 10 trucks would significantly provide further protections to truck drivers and help save lives in our communities where many of them live within. By regulating fleet sizes of 10 or more trucks, nearly 90 percent of the pollution from California's heavy duty trucks would be covered under the rule.

Companies, not drivers, should be held responsible for compliance

with CARB regulations.

In San Diego, we are calling on you, our Air Resources Board, to do your duty and protect California's workers and communities being most negatively impacted by the exploitative practices of companies in these industries.

Thank you for your time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 11:53:35

No Duplicates.

## **Comment 53 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Ti

Last Name: Nguyen

Email Address: compdude22@gmail.com

Affiliation:

Subject: Support for Advanced Clean Fleets Regulation

Comment:

Hello. I support the proposed Advanced Clean Fleets Regulation, as it enables the state to meet its climate goals while also suitably matching the present capabilities of today's electric and hydrogen big-rigs with the drayage use-case that can most effectively be solved with such vehicles. The social equity and economic goals are also non-insignificant, reducing local emissions for residents who do not have the option of moving away from port-related pollution, and to support truck manufacturers in the long-term endeavor to develop longer-range vehicles to further reduce regional emissions. The concessions made to industry appear appropriate for the considerations raised, and I see no reason the Air Resources Board should decline to approve this regulation today.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 12:15:10

No Duplicates.

## **Comment 54 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Alejandro

Last Name: Amador

Email Address: Alejandroa@casafamiliar.org

Affiliation: Casa Familiar

Subject: Support for Advanced Clean Fleets

Comment:

I want to express my strong support for the ACF to be adopted by this board. This regulation would bring direct positive impacts to the environment and public health of our most impacted communities.

In the border region, Otay Mesa is a growing commercial and industrial hub, with nearby residential unit, schools, and the Otay Mesa Port of Entry (POE). According to the Bureau of Transportation, in 2022, roughly 1.05 million trucks alone crossed the Otay Mesa POE which is ranked the 3rd busiest port of entry in North America, San Ysidro POE sits in first place for its automobile traffic.

This measure needs to be adopted for the wellbeing of our communities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 12:27:28

No Duplicates.

## **Comment 55 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Andrea

Last Name: Marpillero-Colomina

Email Address: andreacolomina@greenlatinos.org

Affiliation:

Subject: GreenLatinos comments in support of ACF

Comment:

On behalf of GreenLatinos, an active comunidad advancing environmental justice. I urge the Air Resources Board to vote unanimously in favor of the Advanced Clean Fleet standard. This historic vote will ultimately put an end to diesel death in environmental justice communities within a generation by gradually transitioning dirty diesel truck fleets to pollution-free technologies.

By enacting the ACF standard, we can end the perpetuation of environmental injustices that are literally shortening lives in Black and Brown communities across California. The disproportionate impact of air pollution from cars and trucks is the clearest example of environmental racism in California and it deeply affects the lives of the people who breathe this toxic air, which causes asthma and other sometimes fatal respiratory conditions. Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 13:16:59

No Duplicates.

## **Comment 56 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Josue

Last Name: Aguilar

Email Address: jaguilar@nrdc.org

Affiliation: Natural Resources Defense Council

Subject: NRDC Public Comments

Comment:

Dear California Air Resources Board:

Please accept these 3,476 public comments from members and online activists of the Natural Resources Defense Council (NRDC) urging you to adopt a strengthened Advanced Clean Fleets rule. While there are many aspects of the proposal we support, including requiring all new medium- and heavy-duty vehicles to be zero emission by 2036, the proposal falls short in cleaning up the largest and dirtiest vehicles on our roads.

Californians have had to deal with dangerous levels of nitrogen oxide (NOx) and particulate matter (PM) in our air for too long. This is an equity issue: communities of color and low-income communities are most likely to be nearby major freight routes and therefore exposed to a disproportionate share of this pollution. As a result, residents face greater risks of asthma, lung cancer, heart disease, and strokes.

The current proposal leaves too many of California's buses and trucks unaccounted for. In addition, it would fail to get us to 100% zero-emission truck fleets by the Governor's goal of 2045. Therefore, I urge the Board to adopt the Advanced Clean Fleets rule and direct staff to develop additional standards to further accelerate the transition to zero-emission technologies and prioritize cleaning up California's tractor truck fleets.

There's no time to waste when it comes to cleaning up our air. I urge you to adopt the strengthened proposal and begin work on additional standards to further address freight pollution.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1376-acf2022-AG5dKVw5VWVSCwh4.xlsx>

Original File Name: NRDC Public Comments CA Advanced Clean Fleets.xlsx

Date and Time Comment Was Submitted: 2023-04-27 13:25:15

No Duplicates.

## **Comment 57 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Brady

Last Name: Borcharding

Email Address: bborcharding@fce.com

Affiliation: FuelCell Energy Inc

Subject: FuelCell Energy Comment on ACF Resolution 23-13

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1377-acf2022-BmUGYVMgAzJXDlU0.pdf>

Original File Name: CARB April 27 testimony Borcharding ACF.docx.pdf

Date and Time Comment Was Submitted: 2023-04-27 13:33:39

No Duplicates.



## **Comment 58 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Chelsea

Last Name: Lee

Email Address: chelsea@betterworldgroup.com

Affiliation: ACF Advocacy Coalition

Subject: Equity Groups Oppose Natural Gas Trucks for California's Zero Emission Future  
Comment:

The environmental justice leaders of the ACF Advocacy Coalition appreciate the opportunity to comment and respond to some claims made by others with respect to fracked gas vehicles. We strongly support that the ACF rule must exclude fossil fuel, or fracked gas, vehicles.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1378-acf2022-VDpSNV0oBSMDdwZn.pdf>

Original File Name: Natural Gas Opposition Letter (Final).docx (1).pdf

Date and Time Comment Was Submitted: 2023-04-27 13:30:12

No Duplicates.

## **Comment 59 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Lesly

Last Name: Gallegos

Email Address: leslyg@casafamiliar.org

Affiliation: Casa Familiar

Subject: Support for ACF

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1379-acf2022-Am5ROFwuVlpWfQRb.pdf>

Original File Name: LOS - ACF.pdf

Date and Time Comment Was Submitted: 2023-04-27 13:55:03

No Duplicates.

## **Comment 60 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Alana

Last Name: Langdon

Email Address: alana.langdon@nikolamotor.com

Affiliation: Nikola Corporation

Subject: Nikola Corporation - Public Comments Advanced Clean Fleets Rule

Comment:

April 27, 2023

Nikola appreciates the opportunity to provide comments in support of the adoption of the Advanced Clean Fleets regulation as proposed and applauds CARB for setting ambitious goals to reduce emissions from heavy-duty vehicles.

The adoption of the ACF regulation is critical for "moving the needle" to decarbonize goods movement throughout California by transitioning to zero-emission technologies that are available today. By approving this regulation, CARB will expect to 1) further its commitment to reduce greenhouse gas (GHG) emissions and criteria pollutants from the heavy-duty transportation sector, 2) improve air quality - especially in communities located along major freight corridors which have historically been disproportionately negatively impacted by heavy-duty trucking, and 3) realize a just transition that creates economic opportunity, including clean, equitable, high-quality jobs for CA residents.

As a global leader in zero-emissions transportation and infrastructure, Nikola is addressing "the chicken and the egg" challenge as we pave the way towards a zero-emissions trucking future. Nikola stands ready to support fleets in California, with our two Class 8 trucks that are each eligible for HVIP incentives. The Nikola Tre battery-electric truck, which began production in March 2022 and is currently in the market today and the Tre hydrogen fuel cell electric truck which is expected to begin production in Quarter 4 of this year, with orders currently in process.

To support its and other OEM's zero emission trucks, Nikola is in the process of permitting and constructing a network of permanent heavy-duty hydrogen refueling stations in California, including 4 locations which have been publicly announced.

Until the permanent stations are operable, Nikola is bringing mobile fueling solutions to support zero-emission trucks, with our mobile E-Skid and Mobile Charging Trailer options to support battery-electric trucks. Additionally, under Hyla, Nikola's recently announced energy brand, the company has introduced hydrogen mobile fuelers which provide flexible pre-station fueling options to help meet fleets' demand offering early access to dispensing hydrogen in advance of permanent infrastructure.

Nikola's mobile hydrogen refueling offerings can be placed behind the fence with larger fleets or in a public location to serve the

needs of many fleets. The availability of these mobile, temporary infrastructure solutions enables fleets' accessibility to fueling solutions now to meet the infrastructure demands.

Thank you for your hard work and leadership on this important and historic regulation. We appreciate your consideration and respectfully urge adoption of the Advanced Clean Fleets regulation.

Alana Langdon  
Head of Government Affairs and Global Policy  
Nikola Corporation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 14:04:43

No Duplicates.

## **Comment 61 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Phillip

Last Name: Streif

Email Address: philstreif@vblinc.com

Affiliation: Vandalia Bus Lines

Subject: Heavy Duty Engine Derates

Comment:

Dear California Air Resources Board (CARB),

I am writing on behalf of the motorcoach industry to urge you to accept the new recommendations from the Environmental Protection Agency (EPA) regarding the extension of the derate schedule for heavy-duty diesel engines.

Derating will adversely lead to increased fuel consumption, as the engine has to work harder to perform the same tasks as it would at full power. This can have a negative impact on the environment and can also increase operating costs for fleet owners and operators. In reality when a derate takes place the affect is counterproductive, and doing the exact opposite of CARB's goals in emission reduction.

Although engine performance and fuel consumption is an important aspect in regards, we are specifically focused on the safety concerns. CARB must consider the safety risks associated with derating heavy-duty diesel engines and should explore alternative methods of reducing emissions. This may include the use of cleaner fuels, the adoption of more efficient engine technologies, or other innovative solutions.

While derating may seem like an effective way to reduce emissions, the fact is it is extremely dangerous. By reducing the power output of an engine, derating can compromise the vehicle's ability to perform certain tasks, such as climbing hills or accelerating quickly. This can lead to situations where the vehicle is unable to operate safely, putting the driver, passengers, and other motorists at risk.

There are no circumstances in which an engine should be slowed down below normal operating speeds. Currently we have 4 hours to repair or troubleshoot a vehicle before it is derated to 5mph. That time frame is unrealistic and manytimes impossible to expect operators to have such a narrow window to make the required repairs.

We would like to educate CARB that the nature of our business is very different than other interstate commerce and why we should not be put in this position. First and foremost, we are carrying up to 56 people, not cargo or freight. Most of our passengers include school aged children traveling for school activities, athletic competitions and other academic events. We also move our countries military regularly. Imagine a bus shut down on the interstate carry military personnel to a critical time sensitive function. Our industry also plays a major role in evacuations during natural disasters or other events that require fast mobilization to move citizens out of harms way. California for example experiences wild fires regularly and we are called upon to help get people to safe areas and out of the line of fire. Think of a senior citizen housing facility that has no way to move your grandparents or other citizens that have no method of getting to safety.

It is important that we take all necessary steps to protect the health of our citizens and the environment, but we must do so with common-sense that does not compromise safety for travelers. I urge you to consider the potential risks of derating and to work towards finding safer and more effective solutions to reduce emissions. Our concerns must not be taken lightly. The motorcoach industry has voiced the potential hazards and given fair warning to CARB. We believe that if an engine derate results in an accident or other safety incident, that CARB will be responsible for any resulting damages. It is our position that the regulations put forth by CARB must not compromise the safety of those operating the affected vehicles or equipment. Any harm to passengers or drivers would be a result of the careless misunderstanding and lack of cooperation from CARB. We would take action against carb in the form of lawsuits that are related to a derated engine. We ask you to reconsider the decision to require engine derates and to work with industry experts to develop alternative solutions that achieve the desired emissions reductions without sacrificing safety or performance. We are committed to working with CARB to find a mutually beneficial solution to this issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 14:17:43

No Duplicates.

## **Comment 62 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Ashley

Last Name: Remillard

Email Address: ashley.remillard@hexagonagility.com

Affiliation: Hexagon Agility

Subject: Proposed Advanced Clean Fleets Regulation

Comment:

Good afternoon. My name is Ashley Remillard and I am Senior Vice President of Legal and Government Affairs at Hexagon Agility. Hexagon Agility is the leading global provider of renewable natural gas fuel systems for medium- and heavy-duty commercial vehicles.

I want to address one aspect of staffs' comments relating to the industry's request to prioritize the lowest certified engines. Staff stated that natural gas vehicles are not necessarily cleaner than diesel trucks. This ignores the benefits of renewable natural gas. Approximately 98% of natural gas used for transportation in California comes from methane emitted by renewable sources, including landfill waste, livestock manure, and wastewater treatment plants. As reported by CARB in 2022, renewable natural gas in California is the only fuel with a negative carbon intensity value. This means that the fuel actually reduces the potential of global warming in the atmosphere.

We therefore strongly urge CARB to include language in the final ACF regulation that prioritizes the purchase of the cleanest available engine technology, running on renewable natural gas, when an exemption is granted due to ZEV/NZEV unavailability.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 14:12:12

No Duplicates.

## **Comment 63 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Cassandra  
Last Name: Carmichael  
Email Address: cassandra@nrpe.org  
Affiliation: National Religious Partnership for Envir

Subject: Black Clergy Comments  
Comment:

Attached please find comments regarding clean trucks from more than 100 Black clergy from California and other states around the country.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1383-acf2022-AmFVMIULUWpWNAdx.pdf>

Original File Name: CA HDV signon signers.pdf

Date and Time Comment Was Submitted: 2023-04-27 16:27:50

No Duplicates.



## **Comment 64 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Industry Air Quality Coaliti

Subject: Petition opposing lowering ACF fleet levels from 50 to 10 trucks.

Comment:

Attached is an updated list of small contractors opposing the proposal to lower the threshold for the ACF from 50 to 10 trucks. This petition contains 314 signatures.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1384-acf2022-WjkAZ1QnAjNWD1U1.xlsx>

Original File Name: CARB Petition List 4-26.xlsx

Date and Time Comment Was Submitted: 2023-04-27 16:47:40

No Duplicates.

## **Comment 65 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Kathy  
Last Name: Dervin  
Email Address: dervin.kathy@gmail.com  
Affiliation: 350 Bay Area

Subject: ACF Rule comments  
Comment:

I waited on line for as long as I could today, but you haven't even gotten to the on-line comments. Therefore I am submitting my comments in writing. Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1385-acf2022-UDEFYFM0Ag5XMgJt.docx>

Original File Name: ACF Comments\_KDervin\_350 BayArea.docx

Date and Time Comment Was Submitted: 2023-04-27 17:04:50

No Duplicates.

## **Comment 66 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: Sara

Last Name: Flocks

Email Address: sara@calaborfed.org

Affiliation: California Labor Federation

Subject: Advanced Clean Fleet rule

Comment:

We support the adoption of the Advanced Clean Fleet rule to reduce pollution that disproportionately harms low-income, immigrant, and communities of color. A major obstacle to meeting climate goals is the misclassification of truck drivers. The trucking industry is notorious for misclassifying drivers as independent contractors even while the businesses retain functional control over their operations. CARB has recognized this and we appreciate the inclusion of the rule's definition of "controlling companies" that ensures firms, not drivers, are accountable for the fiscal responsibility of transitioning to clean vehicles. This is a partial but necessary step towards worker justice. But applying the rule to fleets with 50 or more creates a loophole that companies can exploit to evade the ACF rule and that encourages misclassification. We urge CARB to reduce the fleet size threshold to 10 trucks and we hope to work with CARB to ensure owners of fleets of all sizes are deterred from exploiting their drivers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-27 17:09:21

No Duplicates.

## **Comment 67 for Advanced Clean Fleets Regulation (acf2022). (At Hearing)**

First Name: David

Last Name: Yow

Email Address: dyow@portofsandiego.org>

Affiliation:

Subject: Written Comment

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1388-acf2022-UWFXZQMvUjNWZIV4.pdf>

Original File Name: 04-26-23 LegLetter\_CARB\_230426\_v1.pdf

Date and Time Comment Was Submitted: 2023-04-27 17:47:11

No Duplicates.

## **Comment 1 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jed

Last Name: Hendrickson

Email Address: jedhendrickson@gmail.com

Affiliation:

Subject: Oppose Advanced Clean Fleets Regulation

Comment:

The State of California is overrun with laws, rules and regulations. It is time to stop so many rules.

I oppose CARB making such rules and regulations - such regulations are the purview of our state legislature - not bureaucrats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-03-23 15:37:02

No Duplicates.

## **Comment 2 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Dustin

Last Name: Dodds

Email Address: dustin.dodds@yahoo.com

Affiliation: CA Business Affiliate

Subject: CARB

Comment:

Can you provide the public with the data supporting how these proposals provide a cleaner and more affordable world for the lower class? Can you also address how will help the children and women who are mining for your ZEV batteries in South America and other places. Can you also provide data on how much carbon is emitted when mining the critical elements for your ZEV batteries? And finally, how much carbon will be emitted when setting up the infrastructure to make these charging stations for all the ZEVs you are proposing, please include this estimate based on your long term target for number of total ZEV's on the road in CA by 2050.

The letter released to our government, mentions that hydrogen (which you claim to be a big source moving forward to power ZEV) emits at least twice the carbon as gas. (see below)

Here is the letter, please read in detail and submit to your board for consideration.

February 23, 2023

The Honorable Lily L. Batchelder

Assistant Secretary for Tax Policy

Department of the Treasury

Mr. Seth Hanlon

Deputy Assistant Secretary for Tax and Climate Policy

Department of the Treasury

Mr. William M. Paul

Principal Deputy Chief Counsel and Deputy Chief Counsel

(Technical)

Internal Revenue Service

Mr. John Podesta

Senior Advisor to the President for Clean Energy Innovation and

Implementation

White House

Mr. Ali Zaidi

Assistant to the President and National Climate Advisor

White House

The Honorable Jennifer Granholm

Secretary

U.S. Department of Energy

Re: Implementation of the IRA 45V clean hydrogen tax credits as it relates to guidelines for emissions accounting of grid-connected electrolyzers

Dear Assistant Secretary Batchelder, Mr. Hanlon, Mr. Paul, Mr. Podesta, Mr. Zaidi, and Secretary Granholm:

We write to urge Treasury, the Department of Energy (DOE), and the White House to adopt thoughtful and climatealigned implementation

of the 45V clean hydrogen production tax credit (PTC). Our coalition is composed of organizations, companies, and institutions spanning sectors, business models, and interests united by a common concern for the climate and agreement on principles to underpin qualification for the 45V clean hydrogen PTC. Weak guidelines for grid-connected systems risk driving up emissions, in direct conflict with the IRA's requirements. We applaud the 45V tax credit for its potential to support the transition to a clean economy. However, we are concerned that Treasury may adopt insufficiently rigorous guidance concerning the credit's implementation--especially as it relates to grid-connected electrolyzers. Using fossil-generated electricity or siphoning off renewables subsequently back-filled by fossil power to operate electrolyzers--which would occur under loose guidance--generates at least twice the carbon emissions that status-quo gas-derived hydrogen emits. Weak guidance could therefore force Treasury to spend more than \$100 billion dollars in subsidies for hydrogen projects that result in increased net emissions, in direct conflict with statutory requirements and tarnishing the reputation of the nascent "clean" hydrogen industry. Additionality, deliverability, and hourly matching are necessary to guard against negative consequences. To prevent those negative outcomes in contradiction to the IRA's requirements, we support Treasury's implementation of a strong emissions accounting system for grid-connected electrolysis that espouses three pillars: additionality, deliverability, and hourly matching. A robust body of research consistently identifies all three principles as necessary to guard against substantial emissions increases and drive the deployment of truly low or zero emitting hydrogen projects.

1,2

In fact, the recent EU rules European Union's proposed rules in its Hydrogen Delegated Act firmly upheld all three pillars as necessary to demonstrate that hydrogen is "renewable" and has zero-carbon emissions.

Treasury has broad regulatory authority to implement the three-pillar system, and the system is administrable. The IRA requires Treasury to only provide subsidies to projects that reduce "effective GHG emissions," meaning that for electrolysis projects, system-wide grid emissions must be accounted for, and guidance for 45V implementation must be designed to reduce overall emissions. The three-pillar system is necessary to ensure this outcome. Furthermore, Treasury has statutory authority to implement the three-pillar system. The statute provides broad regulatory authority for Treasury to "issue regulations or other guidance to carry out the purposes of this section."<sup>3</sup>

A lifecycle analysis must embed all three pillars in order to meet the purposes of this provision. Furthermore, and to the extent that it is needed, Treasury has specific authority to adopt a "successor model" to the GREET model which can and should include these pillars.<sup>4</sup>

Importantly, each of the three pillars is administrable: signatory companies are either already implementing them or confident that they can successfully do so, and the necessary tools and market structures for compliance with the pillars are widely available. We continue to explore how to leverage existing information already collected by taxpayers and/or reported to federal regulators to

adopt and operationalize these three pillars, and we look forward to working with the White House, Treasury and DOE on this topic.

Hydrogen projects that satisfy the three pillars can be extremely competitive from the outset

Renewable energy and hydrogen developers--including a subset of companies who have signed onto this letter--are already developing profitable projects that satisfy additionality, deliverability, and hourly matching. This provides robust evidence that the system is technically and economically feasible. Developers can successfully manage operations by contracting for diverse clean resources, storing hydrogen, and ramping the electrolyzer load to match clean power availability; in fact, electrolyzer technologies are already capable of efficiently ramping to match variable generation profiles with major ancillary benefits for grid reliability. Further, ongoing financial modeling is robustly concluding that projects that satisfy the three pillars can be extremely competitive from the outset; claims that the three pillars would result in an industry that is "dead on arrival" are therefore demonstrably false. We look forward to further engagement on this topic.

Hourly matching can be widespread in time for large-scale hydrogen development

The tools necessary to accomplish hourly matching are proven, available, and already support existing renewable energy credit (REC) markets. M-RETS--a non-profit and the largest North American credit tracking system--has over 100 million hourly RECs in its system and is already ready to provide hourly certificates nationwide, including all markets and U.S. regions. EnergyTag--a global entity building a market for hourly clean energy certificates--supports over a dozen hourly matching projects worldwide. Both are signatories to this letter. Furthermore, third-party grid data providers such as Electricity Maps and software providers such as FlexiDAO - both signatories to this letter -- already provide both the necessary data and a framework for robust hourly tracking to customers and can do so for hydrogen today.

Otherwise, any regional or national registry who would like to can implement hourly matching tools at scale in less than 12 to 18 months, compared to the no less than 24 months scaling timelines for large-scale electrolyzer deployment. In 1 Ricks, Wilson, Xu, Qingyu, & Jenkins, Jesse D. (2023). Minimizing emissions from grid-based hydrogen production in the United States. Environmental Research Letters.

<https://iopscience.iop.org/article/10.1088/1748-9326/acacb5/meta>  
2 Zeyen, Elisabeth, Riepin, Iegor, & Brown, Tom. (2022). Hourly versus annually matched renewable supply for electrolytic hydrogen (0.1). Zenodo. <https://doi.org/10.5281/zenodo.7457441>

3 See 26 U.S.C. § 45V (f)

4

Id. Sec 45V(c)(1)(B)

fact, PJM will now provide hourly, time-stamped certificates-- an offering which scaled in a short period of time.

5 PJM

developed those tools largely in response to growing demand from large customers, demonstrating that hourly matching is moving forward independently of the hydrogen market such that Treasury guidelines that require less granularity would be contrary to market direction and introduce additional risk to developers. As we note above, M-RETS is already



ready to offer hourly matching nationwide as well as offer regional registries technical assistance and the use of its platform as Western Electricity Coordinating Committee states did when their tracking system WREGIS adopted the M-RETS platform.<sup>6</sup>

Furthermore, increased global demand and policy signals continue to drive the scaling of hourly matching infrastructure.<sup>7</sup>

For example, the U.K. hydrogen standard requires hourly matching, Germany's recently launched tender for green ammonia imports starting in 2024 requires hourly matching and more importantly, the European Union's approved rules in its Hydrogen Delegated Act require all hydrogen projects to prove hourly matching in 2030 onwards, including for hydrogen imports, as the way to prove that the electricity feeding electrolyzers is fully renewable and therefore zero carbon. All these developments should drive a significant acceleration in the roll-out of hourly energy tracking infrastructure in Europe and globally, and the US should not fall behind to guarantee a coherent approach in the clean hydrogen global trade.<sup>8</sup>

Hourly matching is firmly not a complex endeavor that would prevent industry scale and is well understood by customers. For example, companies such as Google and Microsoft already employ the range of those tools and execute contracts based on hourly matching in several U.S. states, and the U.S. government recently signed an MOU with Entergy Arkansas to supply federal agencies with carbon free energy, including 50% on an hourly basis. <sup>9,10, 11</sup> We are therefore confident that hourly matching options will be widely available in time for large-scale hydrogen development.

<sup>5</sup> PJM, PJM EIS To Produce Energy Certificates Hourly, February 13, 2023,

<https://insidelines.pjm.com/pjm-eis-to-produce-energycertificateshourly/#::~text=PJM%20Environmental%20Information%20Services%2C%20Inc,free%20energy%20around%20the%20clock;>

Emma Penrod, "PJM to offer time-matched renewable energy certificates as demand for 24/7 coverage grows," UtilityDive, February 2023,

[https://www.utilitydive.com/news/pjm-to-offer-time-matched-renewable-energy-certificates-as-demand-for247/643135/?utm\\_source=Sailthru&utm\\_medium=email&utm\\_campaign=Issue:%202023-02-](https://www.utilitydive.com/news/pjm-to-offer-time-matched-renewable-energy-certificates-as-demand-for247/643135/?utm_source=Sailthru&utm_medium=email&utm_campaign=Issue:%202023-02-21%20Utility%20Dive%20Newsletter%20%5Bissue:48206%5D&utm_term=Utility%20Dive)

[21%20Utility%20Dive%20Newsletter%20%5Bissue:48206%5D&utm\\_term=Utility%20Dive](https://www.utilitydive.com/news/pjm-to-offer-time-matched-renewable-energy-certificates-as-demand-for247/643135/?utm_source=Sailthru&utm_medium=email&utm_campaign=Issue:%202023-02-21%20Utility%20Dive%20Newsletter%20%5Bissue:48206%5D&utm_term=Utility%20Dive)

<sup>6</sup> M-RETS, WECC Signs Multi-Year Agreement with M-RETS for Software Services, <https://www.mrets.org/wecc-signs-multi-yearagreement-with-m-rets-for-software-services/>

<sup>7</sup> Running list of policies, proposals and regulations requiring hourly (or sub-hourly) matching:

<https://docs.google.com/spreadsheets/d/1nRSKHOTl61SjSsl5hYCgTcZQ79kyXLLrWCNiybFc1Po/edit?usp=sharing>

<sup>8</sup> Baker McKenzie, International: H2Global enables imports of sustainable hydrogen products into Germany and incentivizes investment in green hydrogen outside of the European Union, [https://insightplus.bakermckenzie.com/bm/projects/internationalh2global-enables-imports-of-sustainable-hydrogen-products-into-germany-and-incentivizes-investment-in-green-hydrogen-outside-ofthe-european-union/;](https://insightplus.bakermckenzie.com/bm/projects/internationalh2global-enables-imports-of-sustainable-hydrogen-products-into-germany-and-incentivizes-investment-in-green-hydrogen-outside-ofthe-european-union/) European Commission sets out rules for renewable hydrogen

<sup>9</sup> Google Cloud Blog, Timely Progress Towards Around-the-Clock Carbon-free Energy, March 15, 2022:

<https://cloud.google.com/blog/topics/sustainability/t-eacs-help-drive-around-the-clock-carbon-free-energy>

10 PR Newswire, AES Announces First-of-Its-Kind Agreement to Supply 24/7 Carbon-free Energy for Google Data Centers in Virginia, May 04, 2021.

<https://www.prnewswire.com/news-releases/aes-announces-first-of-its-kind-agreement-to-supply-247-carbon-free-energy-for-google-data-centers-in-virginia-301282750.html>

2. "Microsoft and AES Partner to Bring Around-the-Clock Renewable Energy to Data Centers," November 2, 2021.

<https://www.prnewswire.com/news-releases/microsoft-and-aes-partner-to-bring-around-the-clock-renewable-energy-to-data-centers301414877.html>

3. Silicon Valley Clean Energy, Silicon Valley Clean Energy and Google Announce Comprehensive 24/7 Carbon-free Energy Agreement, June 15, 2022.

<https://svcleanenergy.org/news/silicon-valley-clean-energy-and-google-announce-comprehensive-24-7-carbon-free-energy-agreement/>

4. Canary Media, 24/7 Carbon-free Energy is About to Become a Reality in California, January 18, 2023.

<https://www.canarymedia.com/articles/clean-energy/24-7-carbon-free-energy-is-about-to-become-a-reality-in-california>

11 Entergy News Room, Entergy Arkansas, U.S. government sign first MOU to work toward 24/7 carbon-free electricity, November 15, 2022.

<https://www.entergynewsroom.com/news/entergy-arkansas-u-s-government-sign-first-mou-work-toward-24-7-carbonpollution-free-electric/>

The 45V credits will have far-reaching consequences beyond the hydrogen industry; thoughtful implementation is imperative

The magnitude of the 45V credit will have ripple effects well beyond the hydrogen economy. While secondary to satisfying the IRA's legal emissions requirements, implementation guidance will impact grid congestion; electricity prices; water supplies; long-term hydrogen, renewable energy, and storage infrastructure; electrolyzer technology development; and energy resource siting.

Treasury should work with DOE and the White House to implement a strong system embedding the three pillars

We urge Treasury to work closely with DOE and the White House to design rigorous guidelines for grid-connected electrolyzers that embed additionality, deliverability, and hourly matching. The breadth of this letter's signatories should demonstrate significant confidence in this system's technical and economic feasibility, administrability, and necessity to comply with the IRA's emission requirements and safeguard the climate integrity of the 45V tax credits.

We have the solutions to get this right. The signatories stand ready to work with Treasury, DOE, and the White House to design a strong and legally durable system. Please do not hesitate to reach out to us should you have questions about the items we have put forward.

Sincerely,

Clean Air Task Force

EDP Renewables

Electric Hydrogen

Electricity Maps

Energy Innovation

EnergyTag

Environmental Defense Fund

Evergreen Action

FlexiDAO

Galvanize Climate Solutions  
Intersect Power  
M-RETS  
Natural Resources Defense Council  
Nordex USA, Inc  
Rondo  
Singularity Energy  
Synergetic LLC  
Union of Concerned Scientists

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-03-24 06:59:53

No Duplicates.

### **Comment 3 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Darrell

Last Name: Zentner

Email Address: darrell@hennertanklines.com

Affiliation: Henner Tank Lines

Subject: ZE Trucks

Comment:

We are asking the CARB board to consider the time line given for the 10% ZE trucks for larger fleets be extended. The trucks that can actually give us the mileage needed to let our drivers work full shifts are not available and the technology is not there yet. We are also concerned with the lack of direction from the CARB Board when it comes to the disposal and recycling of the batteries for large ZE trucks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-03-24 08:36:15

No Duplicates.

## **Comment 4 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Gil

Last Name: Ocegüera

Email Address: larissaocegüera@gmail.com

Affiliation: RPU

Subject: Low emission/electric Vehicles

Comment:

I am for low emission/electric vehicles and consider them valuable.

Gil However, no one is addressing the issue of disposing of the lithium/electric vehicle batteries. This is a major problem and concern for our future. We are not able to dispose of the SONGS radio active materials and there is no light at the end of the tunnel in the future.

Where and how are we going to dispose of the spent batteries?

Also, no one has discussed the issue of the production of lithium batteries and the effect that process has on our atmosphere.

Because the mining and processing of the lithium cause major negative results to our atmosphere.

Who will open up these discussions so as to be transparent with the public. My sense is that this fix may the opposite results to our atmosphere.

Gil. Ocegüera

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-03-27 09:27:57

No Duplicates.

## **Comment 5 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michael

Last Name: Lewis

Email Address: Non-web submitted comment

Affiliation:

Subject: ACF comment

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/416-acf2022-UTBVMAZhAzNQOQJv.pdf>

Original File Name: acfcomment1.pdf

Date and Time Comment Was Submitted: 2023-03-28 08:43:16

No Duplicates.

## **Comment 6 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michael

Last Name: Lewis

Email Address: Non-web submitted comment

Affiliation:

Subject: ACF comment

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/418-acf2022-WzpcOVA3WGgLYgVo.pdf>

Original File Name: acfcomment3.pdf

Date and Time Comment Was Submitted: 2023-03-28 08:47:40

No Duplicates.

## **Comment 7 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michael

Last Name: Lewis

Email Address: Non-web submitted comment

Affiliation:

Subject: ACF Comment

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/420-acf2022-VDVVMFA3BzcAaQhl.pdf>

Original File Name: acfcomment4.pdf

Date and Time Comment Was Submitted: 2023-03-28 08:57:45

No Duplicates.



## **Comment 8 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michael

Last Name: Lewis

Email Address: Non-web submitted comment

Affiliation:

Subject: ACF Comment

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/421-acf2022-AmNVMFYxBDQDagFs.pdf>

Original File Name: acfcomment2.pdf

Date and Time Comment Was Submitted: 2023-03-28 09:02:49

No Duplicates.

## **Comment 9 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jessica

Last Name: Clabaugh

Email Address: jessica@borregowd.org

Affiliation:

Subject: ZEV Threatens Public Agency Resiliency

Comment:

Borrego Water District is located in an isolated, rural corner of San Diego County with an unreliable power grid. SDGE has installed a microgrid in our area to mitigate but it has become the town joke because it doesn't work! We are battered by frequent power outages and a solar charged fleet is unrealistic. Not to mention local electric rates are soaring and our agency's power costs have increased 17% over the prior fiscal year with more rate increases expected.

In addition, our agency serves an SDAC community over a Severely Overdrafted Groundwater Basin under adjudication. Groundwater management costs are already resulting in increased water rates to the community and now they are going to have to cover the additional costs associated with charging and maintaining an electric fleet.

Enforcing these measures is premature as California should first focus on ensuring reliable and affordable electricity so that the zero-emission goal can be realized.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-03-28 14:17:13

No Duplicates.

## **Comment 10 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Emily

Last Name: Long

Email Address: elong@tudwater.com

Affiliation: Tuolumne Utilities District

Subject: Advanced Clean Fleets Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/423-acf2022-WjZXNFMmV3ADYAl7.pdf>

Original File Name: Letter of Opposition- Advanced Clean Fleets Regulation.pdf

Date and Time Comment Was Submitted: 2023-03-29 14:54:37

No Duplicates.

## **Comment 11 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Andrew

Last Name: Cuzman

Email Address: city55soccer@yahoo.com

Affiliation:

Subject: WHO DO YOU THINK YOU ARE?

Comment:

HAVE YOU EVER HEARD OF THE U.S CONSTITUTION? YOU CANNOT JUST TAKE  
PEOPLES BELONGINGS FOR NO REASON. CO2 EMISSIONS ARE NOT A REASON TO  
TAKE PEOPLE TRUCKS AND BUSINESS AND LEAVE THEM HOMELESS.  
CA IS PATHETIC AND SO IS EVERYONE RUNNING CALI

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-03-30 08:46:53

No Duplicates.

## **Comment 12 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Shannon

Last Name: Orellana

Email Address: shannon@icon-logistics.com

Affiliation: Icon Logistics Group, Inc.

Subject: CA cannot sustain on grid

Comment:

I oppose this measure due to California is not ready to sustain this kind of draw on the electrical grid. Manufacturers cannot put out the innovation to make the trucks haul a load over 100 miles without stopping for hours to charge. ILWU is putting the LA/LB competitive edge at complete risk due to the stance on settling contracts which has put major risk on carriers. I do understand clean air but this idea needs to go before the people of CA for a vote. We the people are paying the taxes on all these ideas and we the people need to have the say.

Too many companies have left California because it is not competitive for businesses and this would further accelerate this process. Not to mention the crisis of suppling anything to the residents of this state would be so limited that I can see a complete rebellion of your constituents with inflation being so high, no work, and homelessness on the rise.

California needs to become competitive again and put the people first instead of politics. I am apposed of this idea, California is not ready with power grid or any concern for small businesses at all.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-03-30 08:59:19

No Duplicates.

## **Comment 13 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Anne

Last Name: McQueen

Email Address: amcqueen@yorkeengr.com

Affiliation:

Subject: Questions about ARB ACF HPF rule 15-day pkge March 23, 2023

Comment:

See attached file

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/439-acf2022-VzYFYFA3UV0DbQh4.pdf>

Original File Name: ACF HPF Questions Mar3123.pdf

Date and Time Comment Was Submitted: 2023-03-31 10:55:19

No Duplicates.

## **Comment 14 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: TAHA

Last Name: SALEH

Email Address: taha@tasaleh.com

Affiliation:

Subject: PROPOSED MODIFICATIONS TO ADVANCED CLEAN FLEETS REGULATION  
Comment:

See Attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/440-acf2022-VDdSNQFyVWQCWwBh.pdf>

Original File Name: CARB ACF 2023.pdf

Date and Time Comment Was Submitted: 2023-03-31 18:33:32

No Duplicates.

## **Comment 15 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Rick

Last Name: Thomas

Email Address: rockerrick2008@yahoo.com

Affiliation:

Subject: Advance Clean Fleet

Comment:

I just wanted to let you know that I have emailed the following companies letting them know that I have came up with a way to enhance their current technology allowing them to meet and accede each and everyone of your expectation now and in the future.

Those companies are Tesla inc, Hyliion Holding, Paccar inc, Kenworth Inc, Peterbilt inc., Freightliner inc., International inc., Volvo inc., and Cummins inc.

I know from the article's I have read that they are complaining about how they are not going to be able to comply with the new rules that you are getting ready to implement in the ner future, but each and everyone of those reasons that there usingof the reason that they give for not being able to comply can be handled and would no longer be an obstacles for them meetings your standards.

What I have come up with will work for Semi Trucks, Buses, and Cars, It would eliminate the issue with using the power grid, because they would be able to charge themselves as they travel, it would eliminate the Battery issue because they would not need as many batteries, and it would not increase that much on the price to build them.

The only reason I have been able to come up with of why they won't respond back to my emails is because they will not be able to charge their customers at the Charging Station,

All this when most of them have received grants to further this technology but someone like me trying to help them advance even more but they ignore my emails

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-01 08:33:22

No Duplicates.



## **Comment 16 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Beatrice

Last Name: L

Email Address: beatricelamym@gmail.com

Affiliation:

Subject: Please consider the negative ramifications on the state

Comment:

Please see attached for comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/444-acf2022-UDMGB1c7UG5XNFM9.docx>

Original File Name: Comments on CARB ACF 2023.docx

Date and Time Comment Was Submitted: 2023-04-03 10:55:34

No Duplicates.

## **Comment 17 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Stephen

Last Name: White

Email Address: swhite@rottenrobbie.com

Affiliation:

Subject: Comments in Opposition to Advance Clean Fleets rule as modified

Comment:

Please see attached comments in Opposition to the Advanced Clean  
Fleets rule as modified

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/445-acf2022-UCJUPVIXVmwEbFMg.pdf>

Original File Name: Robinson Oil comments on Advanced Clean Fleets Regulation.pdf

Date and Time Comment Was Submitted: 2023-04-03 14:23:11

No Duplicates.

## **Comment 18 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Diane

Last Name: Williams

Email Address: dwilliams@brentwoodca.gov

Affiliation: City of Brentwood

Subject: Comments on the Draft ACF Public Fleets Regulatory Language

Comment:

Please accept these comments from the City of Brentwood on the CARB draft ACF regulations. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/446-acf2022-WzFTN1F9VGQCa1M+.pdf>

Original File Name: JB-Comments to CARB Proposed ACF Regulation 04.03.23.pdf

Date and Time Comment Was Submitted: 2023-04-03 14:57:49

No Duplicates.

## **Comment 19 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Kathy

Last Name: Laderman

Email Address: sagehenkal47@yahoo.com

Affiliation:

Subject: Modifications for the Advanced Clean Fleets Regulation

Comment:

I write in strong opposition to the modifications of the proposed Advanced Clean Fleets rule.

My grandfather was a trucker and I understand how important truckers are to making sure our goods get to where we need them. Mandating the transition to zero emissions fleets -- before there are enough trucks available and the costs are sky-high -- will increase the cost of living in California to an even higher level. In these already inflationary times, we're already working longer hours to bring home less.

With electricity demand higher than ever, a crumbling infrastructure in the state, and an unreliable grid, it is not good policy. Let's figure out the technology needed to keep trucks moving -- looking at all kinds of lower emissions options -- then create regulations. This is too much, too soon.

I respectfully oppose the adoption of the Advanced Clean Fleets rule as modified.

Sincerely,

Kathy Laderman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-03 15:28:13

No Duplicates.

## **Comment 20 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Kirk

Last Name: Wasson

Email Address: kirkwasson7@gmail.com

Affiliation:

Subject: clean fleets regulation

Comment:

We are not ready for it yet, also this will be enforced when those who made the rules are out of office. Not a smart idea.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-03 17:21:17

No Duplicates.

## **Comment 21 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Alissa

Last Name: Recker

Email Address: [alissa.recker@daimlertruck.com](mailto:alissa.recker@daimlertruck.com)

Affiliation: Daimler Truck North America

Subject: DTNA Comments on Modified Text

Comment:

Please find attached comments for DTNA.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/449-acf2022-VDACcAFuWWtRCAVm.pdf>

Original File Name: DTNA Comments for ACF Regulatory Documents.pdf

Date and Time Comment Was Submitted: 2023-04-04 04:04:54

No Duplicates.

## **Comment 22 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Hernan

Last Name: Molina

Email Address: hmolina@weho.org

Affiliation: Governmental Affairs Liaison, City of WH

Subject: City of West Hollywood comments on the Draft ACF Public Fleets Regulatory

Language

Comment:

The City's comments on the proposed draft ACF regulations are included in the attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/450-acf2022-UDNWMQBzUWBRCFUx.pdf>

Original File Name: CARB Draft ACF regulations 04 04 2023.pdf

Date and Time Comment Was Submitted: 2023-04-04 10:40:21

No Duplicates.

## **Comment 23 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Rebecca  
Last Name: Simonian  
Email Address: rebeccas@cityofclovis.com  
Affiliation: City of Clovis - City Council

Subject: Comments on the Draft ACF Public Fleets Regulatory Language  
Comment:

Good morning,

Please find attached the City of Clovis letter commenting on the proposed Advanced Clean Fleets Regulations.

Thank you,

Rebecca Simonian  
Executive Assistant  
Administration Department  
City of Clovis  
1033 Fifth Street  
Clovis, CA 93612  
(559) 324-2063 - Phone  
(559) 324-2840 - Fax  
rebeccas@cityofclovis.com

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/451-acf2022-VTkGdFUmVykcW1c0.pdf>

Original File Name: Ltr- CARB Advanced Clean Fleet Regulation.pdf

Date and Time Comment Was Submitted: 2023-04-04 11:07:32

No Duplicates.



## **Comment 24 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Hugh  
Last Name: Rafferty  
Email Address: Hugh.rafferty@yahoo.com  
Affiliation:

Subject: Acf2022  
Comment:

I oppose.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-04 12:58:18

No Duplicates.

## **Comment 25 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Mike

Last Name: Sims

Email Address: msims@bonitafd.org

Affiliation: Bonita Sunnyside Fire Protection Distric

Subject: AB 1594 - Advanced Clean Fleet

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/453-acf2022-AGNXMFckUmMFXAZk.pdf>

Original File Name: CARB Board Letter.pdf

Date and Time Comment Was Submitted: 2023-04-04 13:41:02

No Duplicates.

## **Comment 26 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Diane

Last Name: Piccioli

Email Address: dpiccioli@truckeesan.org

Affiliation: Truckee Sanitary District

Subject: CARB-ACF Comment Letter

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/458-acf2022-Wy8Gc1I3VVkKbwdo.pdf>

Original File Name: TSD Comments on Draft CARB ACF Lettter.pdf

Date and Time Comment Was Submitted: 2023-04-04 14:07:16

No Duplicates.

## **Comment 27 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Ryan

Last Name: McNeil

Email Address: ryan@fresnomosquito.org

Affiliation: Fresno Mosquito and Vector Control Dist

Subject: CARB / ACF Comments

Comment:

Please see attached letter for CARB / ACF comments.

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/459-acf2022-BmVdOlAjUGFQCVIz.pdf>

Original File Name: CARB ACF Comment Letter April 2023.pdf

Date and Time Comment Was Submitted: 2023-04-04 14:57:03

No Duplicates.

## **Comment 28 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michelle

Last Name: Brown

Email Address: mbrown@wvmvcd.org

Affiliation: West Valley Mosquito and Vector Control

Subject: Comments to CARB\_ACF

Comment:

Please see the attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/460-acf2022-WmhTZVBjBWVWD1Ix.pdf>

Original File Name: 2023 CARB comment - West Valley MVCD.pdf

Date and Time Comment Was Submitted: 2023-04-04 16:04:43

No Duplicates.

## **Comment 29 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Matthew

Last Name: Shragge

Email Address: mshragge@29palmswater.org

Affiliation: Twentynine Palms Water District

Subject: Draft Advanced Clean Fleets Regulation

Comment:

Please see the Twentynine Palms Water District's comments regarding the proposed regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/461-acf2022-VzRXMAZ1AjNSCwUo.pdf>

Original File Name: CARB - Comment Ltr.pdf

Date and Time Comment Was Submitted: 2023-04-05 09:14:43

No Duplicates.

## **Comment 30 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Becky

Last Name: Hopkins

Email Address: bhopkins@cityofpleasantonca.gov

Affiliation: City of Pleasanton

Subject: Comment re: ACF regulations

Comment:

On behalf of the City of Pleasanton, Please find attached the City of Pleasanton comment letter from City Manager Gerry Beaudin.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/462-acf2022-BjJUfFZiVShVYVNg.pdf>

Original File Name: 4.5.23 Pleasanton Comment Ltr RE ACF Regulation.pdf

Date and Time Comment Was Submitted: 2023-04-05 10:02:18

No Duplicates.

## **Comment 31 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Damon

Last Name: Wyckoff

Email Address: damonw@ccwd.org

Affiliation: Calaveras County Water District

Subject: The Proposed Advanced Clean Fleets Regulation & The States Human Right To Water  
Comment:

Thank you for the opportunity to provide comments highlighting the fact that water utilities in California are indeed First Responders and should be designated as such within the Proposed Advanced Clean Fleets Regulation as well as the fact that requiring Public Water Utilities to implement non-existent and at-best deficient tools in the Operation, Maintenance, and Repair of public water system infrastructure reduces system reliability and public health and safety. This fact is at odds with the States Human Right to Water Act (AB 685, 2012).

The CARB needs to pause and weigh these impacts and conflicts before imposing the Advanced Clean Fleets Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/463-acf2022-BjYAMgY3UzMEMFdk.pdf>

Original File Name: 040323 CARB Comment Letter.pdf

Date and Time Comment Was Submitted: 2023-04-05 10:09:30

No Duplicates.



## **Comment 32 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jonathan

Last Name: olson

Email Address: jonathan.olson@co.del-norte.ca.us

Affiliation: County of Del Norte

Subject: County of Del Norte Comments on the Draft ACF Public Fleets Regulatory Language  
Comment:

Thank you for allowing us the opportunity to provide written responses to the proposed Advance Clean Fleets Regulations. See attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/464-acf2022-VDBUPFAyWGRQCQdk.pdf>

Original File Name: DNCO Comment letter on ACF EV public Fleets Rule.pdf

Date and Time Comment Was Submitted: 2023-04-05 11:10:47

No Duplicates.

## **Comment 33 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Bob

Last Name: Shepherd

Email Address: bshepherd@quinncompany.com

Affiliation: California Caterpillar Dealers

Subject: Comments to Proposed ACF Regulation

Comment:

Please see attached comments to this extremely complicated regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/465-acf2022-AGEHYgBnAAwCKQdY.pdf>

Original File Name: ACF - 2023 - 15 Day Comments on Issues for Heavy Construction Rental and Service Companies.pdf

Date and Time Comment Was Submitted: 2023-04-05 12:08:58

No Duplicates.

## **Comment 34 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Bert

Last Name: Rapp

Email Address: Bert@VenturaRiverWD.com

Affiliation: Ventura River Water District

Subject: Impact of Clean Fleets potential Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/466-acf2022-UGICNAc0VTUGLQAw.pdf>

Original File Name: 2023-04-05 CARB\_ACF\_Comment\_Letter.pdf

Date and Time Comment Was Submitted: 2023-04-05 13:18:30

No Duplicates.

## **Comment 35 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Nancy

Last Name: Bartlett

Email Address: bartlett\_n@yahoo.com

Affiliation:

Subject: Advanced Clean Fleets Act

Comment:

I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsom's executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-05 11:50:37

No Duplicates.

## **Comment 36 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Rhea

Last Name: Varley

Email Address: rvarley@cityofarcata.org

Affiliation: City of Arcata

Subject: Local governments fleets: Zero emission vehicle requirements. Proposed ACF Regulation.

Comment:

See Attached letter with public comment on proposed Advanced Clean Fleet regulations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/468-acf2022-VjUAbwB1V30EXQRr.pdf>

Original File Name: City of Arcata-Cal Cities ACF-Proposed Regulations-- Signed.pdf

Date and Time Comment Was Submitted: 2023-04-05 15:09:04

No Duplicates.

## **Comment 37 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Will

Last Name: Garner

Email Address: wgarner@placer.ca.gov

Affiliation: County of Placer

Subject: Placer County Comments - AFC 2022

Comment:

Letter from DPW Director, Ken Grehm, Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/469-acf2022-WjlXMFAjU2JXDgcz.pdf>

Original File Name: CARB 4.5.23 Placer County .pdf

Date and Time Comment Was Submitted: 2023-04-05 16:12:23

No Duplicates.

## **Comment 38 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Bryan

Last Name: White

Email Address: Hiinhi@yahoo.com

Affiliation: Retiree/disability

Subject: Older trucks

Comment:

I use an older truck to pull a utility and travel trailer. I can't afford an electric car or truck on my income. Force my family and I out of California for non-compliance?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-05 20:00:23

No Duplicates.

## **Comment 39 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Christopher

Last Name: Lish

Email Address: lishchris@yahoo.com

Affiliation:

Subject: Please Approve the Updated Advanced Clean Fleets Rule

Comment:

Thursday, April 6, 2023

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: Please Approve the Updated Advanced Clean Fleets Rule --  
Notice of Public Availability of Modified Text and Availability of  
Additional Documents for the Advanced Clean Fleets Regulation  
(acf2022)

Dear California Air Resources Board:

I am writing to commend the California Air Resources Board (CARB) for accelerating its proposed 100% sales target from 2040 to 2036. The work CARB is doing to eliminate pollution from California's heavy and medium-duty trucks is admirable, and the climate and air quality crises demand that you maintain this more aggressive deadline.

Trucks make up a small portion of vehicles on the road in California, but are the largest producer of our notorious smog problem and pose the most cancer risk connected to pollution from our transportation sector. Burning diesel creates one of the most toxic forms of air pollution for human health, and is linked to premature death, chronic heart and lung disease, asthma, and diminished lung function in children. A delayed timeline for 100% electric trucks will only lead to further adverse health and climate impacts for Californians.

Californians are feeling the impacts of the climate crisis every day, from extreme heat to rising sea levels to wildfires to droughts. Millions of Californians continue to live in communities that are out of compliance with federal air quality standards and whose health suffers greatly as a result. The state must urgently move away from fossil fuels and towards renewable energy and zero emission technologies to help address these critical issues.

Now, with the improvement of accelerating the 100% ZEV sales target to 2036, CARB's proposed Advanced Clean Fleets rule would deliver even greater and significant emissions reductions.

According to CARB's own analysis, the proposed Advanced Clean Fleets rule would provide:

- \* Over \$26 billion in additional health benefits due to greatly reduced NOx and PM 2.5 emissions.



- \* The avoidance of over 2,500 additional premature deaths.
- \* Net economic benefits to the state of over \$37 billion.
- \* A 58% reduction in annual GHG emissions by the year 2045.

CARB cannot miss this opportunity to combat the climate crisis and deliver clean air to overburdened, frontline communities. Please do right by everyone in California and bring 100% electric trucks to our state. Finalize the proposed 2036 deadline and commit to accelerating electrification of the remaining trucks on the road by retiring old combustion trucks and strengthening the manufacturer requirements leading up to 2036. Please approve this proposed rule!

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-06 06:43:45

No Duplicates.

## **Comment 40 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Herb

Last Name: Niederberger

Email Address: hniederberger@spmud.ca.gov

Affiliation: South Placer Municipal Utility District

Subject: Comments on Draft SCF Regulations

Comment:

The South Placer Municipal Utility District (District) appreciates the opportunity to provide comments on the ACF draft regulatory language for public fleets as proposed by California Air Resources Board (CARB) staff. While the latest iteration of the ACF regulation reflects some exemptions and extensions, the District remains seriously concerned and requests further amendments.

Please see attached letter dated April 5, 2023 for detailed comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/472-acf2022-UTJSNVAjVWRXDgBs.pdf>

Original File Name: CARB Letter re ACF Reg 2023-0405.pdf

Date and Time Comment Was Submitted: 2023-04-06 06:51:49

No Duplicates.

## **Comment 41 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Don

Last Name: Zdeba

Email Address: don.zdeba@iwwvd.com

Affiliation: Indian Wells Valley Water District

Subject: Draft Advanced Clean Fleets (ACF) Regulation

Comment:

Please disregard my earlier submittal. Part of a paragraph on page 2 is missing from the pdf. I have attached the full letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/474-acf2022-UDIXJgF2UnZRMwBf.pdf>

Original File Name: IWWVD Comment Letter\_Advanced Clean Fleets Regulation\_040623.pdf

Date and Time Comment Was Submitted: 2023-04-06 07:45:20

No Duplicates.

## **Comment 42 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: John

Last Name: McNamara

Email Address: jmcnamara@crrmail.com

Affiliation: CR&R Environmental Services

Subject: CR&R Environmental Services Comments on the Proposed Advanced Clean Fleet Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/475-acf2022-WjlVIVMNAiMAWQlq.pdf>

Original File Name: CR&R\_CARB ACF comments\_April 7 2023.pdf

Date and Time Comment Was Submitted: 2023-04-06 08:04:21

No Duplicates.

## **Comment 43 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Ken

Last Name: Broadway

Email Address: elizabeth.sorg@rocklin.ca.us

Affiliation: Mayor, City of Rocklin

Subject: City of Rocklin Comments on Draft ACF Language

Comment:

The City of Rocklin appreciates the ability to comment on the draft ACF regulatory language. The City has concerns about the timeline for implementation and is requesting modifications to the regulatory language. Full comment letter is attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/476-acf2022-AWJSPQZzAihQCVU6.pdf>

Original File Name: City of Rocklin ACF Letter.pdf

Date and Time Comment Was Submitted: 2023-04-06 08:32:28

No Duplicates.

**Comment 44 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Eric

Last Name: Grubb

Email Address: ericg@cvwdwater.com

Affiliation: Cucamonga Valley Water District

Subject: Proposed ACF Regulations

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/477-acf2022-UjECcgF3V2BQCQVm.pdf>

Original File Name: CVWD Clean Fleets Letter 040623.pdf

Date and Time Comment Was Submitted: 2023-04-06 09:09:18

No Duplicates.

## **Comment 45 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jon

Last Name: Zamorano

Email Address: jzamorano@bbccsd.org

Affiliation: Big Bear City Community Service District

Subject: Comments on Draft Advanced Clean Fleets

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/478-acf2022-UzBSO1I+VmhQMwZo.pdf>

Original File Name: Comments on Advanced Clean Fleets.pdf

Date and Time Comment Was Submitted: 2023-04-06 09:11:10

No Duplicates.

## **Comment 46 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Craig

Last Name: Baker

Email Address: lobby@ellisonwilson.com

Affiliation: California Tow Truck Association

Subject: California Tow Truck Association CARB ACF Comments

Comment:

The California Tow Truck Association (CTTA), known nationally as the Emergency Road Service Coalition of America (ERSCA), submits the attached comments on CARB's proposed Advanced Clean Fleets (ACF) regulation, which will imprudently mandate the acceleration of medium- and heavy-duty zero-emission vehicles (ZEVs) in California, despite the absence of sufficient vehicle, charging infrastructure, and funding availability. Because the proposed 15-day changes do not fundamentally address the concerns raised within CTTA/ERSCA's comments submitted to the Board on October 17, 2022, CTTA/ERSCA must remain opposed to the ACF regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/479-acf2022-AWJSIFInWWtRCAVm.pdf>

Original File Name: CTTA CARB ACF Comments.15 day.pdf

Date and Time Comment Was Submitted: 2023-04-06 09:33:18

No Duplicates.



## **Comment 47 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Frank

Last Name: Wolinski

Email Address: fwolinski@vidwater.org

Affiliation: VISTA IRRIGATION DISTRICT

Subject: Comments to the Board

Comment:

Please see attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/480-acf2022-AmNSMAF2BTcCalIx.docx>

Original File Name: Advanced Clean Fleets Regulation\_Public Comment Letter\_Vista Irrigation District..docx

Date and Time Comment Was Submitted: 2023-04-06 09:37:24

No Duplicates.

## **Comment 48 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Erin

Last Name: Graziosi

Email Address: [egraziosi@rottenrobbie.com](mailto:egraziosi@rottenrobbie.com)

Affiliation: Robinson Oil Corp

Subject: Clean Fleet Proposed Regulation Modifications

Comment:

Robinson Oil respectfully opposes the adoption of modifications to the Advanced Clean Fleets rule as it continues its attempts to transition the transportation and goods movement economy much too quickly without sufficient regard for the necessary infrastructure overhaul in the state, a realistic consideration of the state's power grid capabilities, and the lack of an adequate and accurate cost analysis.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/481-acf2022-VzpcNVUwBD5VNQVs.pdf>

Original File Name: Modifications Advancd Clean Fleets Regulation.pdf

Date and Time Comment Was Submitted: 2023-04-06 11:01:20

No Duplicates.

## **Comment 49 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Sarah

Last Name: Holyhead

Email Address: sarah.holyhead@nevadacountyca.gov

Affiliation: County of Nevada Board of Supervisors

Subject: County of Nevada Comments on Draft Advanced Clean Fleets (ACF) Regulation  
Comment:

To Whom it May Concern:

The County of Nevada shares climate resiliency goals with the California Air Resources Board (CARB) and other State partners. The County appreciates the opportunity to provide comments on the ACF draft regulatory language (March 23rd iteration) for public fleets as proposed by CARB staff.

We are concerned that the regulation will not be fully funded, may negatively impact our already limited road maintenance funding, and does not include sufficient environmental exemptions for construction, funding and public utility mandates for zero emission vehicle (ZEV)/ zero emission bus (ZEB) infrastructure.

While the latest iteration of the ACF regulation reflects some of the exemptions and extensions that have been requested, we remain concerned with the following issues and respectfully request further amendments.

Timelines and Public Funding. The proposed regulations continue to impose aggressive timelines for public fleets to comply and do not consider existing local agency budget constraints and funding methods for capital projects.

Many local governments budget every two years, and many have a five-year capital budget cycle that cannot be easily repurposed at the scale this proposed regulation would require. Mandating compliance to start January 1, 2024, or even January 1, 2027 for rural agencies such as ours, for a proposed regulation that would require significant and immediate investment and allocation from local agency budgets for the preconstruction, site preparation, and coordination with energy providers is simply unattainable.

For example, Nevada County, as a rural small community and in partnership with the Nevada County Transportation Commission, is currently in the process of hiring a consultant to develop an alternative fuel plan. This means that we are still in the planning stage for electrifying our fleet and will likely not be ready by 2027 to purchase ZEV's for many of our departments. In talking to our rural community partners, we are ahead of most on this front.

In addition, we are in year three of working through design, PG&E coordination, environmental and CEQA to put in charging stations for ZEBs that have been ordered but are two years out from being received. The supply chain is not prepared for the proposed

regulations either.

And yet another example, there are no electric road equipment suppliers that have products to meet our basic minimum needs (e.g., grading, snow plowing, etc.). Even if we ordered a traditional grader, the supply chain is at least a year out.

Electrifying service yards to support an electrified fleet is a much greater undertaking than a simple electricity panel upgrade or some quick trenching in the parking lot. Upgrading infrastructure, purchasing vehicles, training workforce, and complying with mandated reports is not something local agencies can easily comply with. Inflation and other cost increases have already stretched budgets to their limits.

The proposed regulation also ignores existing market realities and the time needed to develop and ramp up an infrastructural system that can support an electrified fleet of essential vehicles. If required to comply with the proposed regulation as drafted, the projected infrastructure and fleet costs will add substantial rate increases across multiple public works and utility service departments. There is no current funding for these increased costs. It will take at least a year to put together a funding plan and then could take another year or more to place new taxes on the ballot or hold Proposition 218 protest proceedings. If voters reject such tax and fee increases, local agencies will be left with no resources to afford the immediate up-front costs necessary to comply with the regulation.

While savings may eventually manifest from retiring or repurposing assets oriented to internal combustion engines (ICE), they will have no effect on the upfront capital expenses. For these reasons, we believe that local governments need an extension of at least four years from regulation adoption and we encourage the State of California to develop a substantial grant program to support local governments in complying without imposing an undue burden upon their ratepayers and taxpayers already struggling to make ends meet at this time of high inflation.

**Exemptions.** Local agency vehicles essential to the health and safety of residents should be fully exempt from the regulation. While some of these vehicles are captured under the current emergency vehicle exemption, it should be expanded.

In addition to emergency vehicles currently defined in the California Vehicle Code, the following local agency vehicles must be operable 24 hours per day, 365 days per week. Any interruption in their regular use could jeopardize the health and safety of the communities they serve. Given the most likely current or future ZEV options will depend upon a consistently accessible source of electricity, the risk of disruption whether due to an earthquake, public safety power shutoff, rolling brownout, wildfire, flood, or other natural disaster is too great to risk the operability of these vehicles and health and safety of Californians:

- Valve trucks, welding trucks, and other vehicles essential to the repair and maintenance of water, wastewater, and other utilities. These are particularly critical during and following the very events that could interrupt the ability of ZEVs to operate.
- Vehicles used by open space, regional park, and other agencies to spot wildfires, mitigate wildfires, rescue lost or injured hikers, and prevent poaching of animals.

- Vehicles used by mosquito abatement and vector control agencies to prevent and disrupt the proliferation and uncontrolled spread of dangerous known and unknown vectors.
- Vehicles used for grading of gravel and dirt roads. Thirty-nine percent of County-maintained roads in Nevada County are dirt or gravel, so grading equipment should be exempt from the requirements for this essential service.

In addition, we are requesting a Small Agency/Department automatic exemption based on fiscal hardship. We also request you expand the existing delayed implementation for small vehicle fleets in non-designated (non-low population) counties to include agencies that purchase fewer than two vehicles in a calendar year.

Otherwise, the current "rounding-up" rule would apply the regulation to 100% of vehicles purchased by agencies purchasing just one vehicle in the initial three-year implementation period even though that period is intended to only require 50% of vehicles comply. Agencies purchasing just one vehicle in a calendar year are the smallest agencies in the state that are the least able to comply with the reporting mandates and costs associated with the regulation. Moreover, in purchasing just one vehicle, an agency has no means to mitigate the added cost of ZEV additions as an agency purchasing multiple vehicles can by strategically purchasing 50% ICE vehicles for the vehicle models that may be least affordable as ZEVs.

Price Caps. We request that CARB impose price caps to ensure the market positively responds with vehicles at competitive rates. Local governments strive to be good stewards of the taxpayer's dollars, but without price caps, complying with the proposed regulations may force a purchase of ZEVs that are put to market at an artificially inflated rate. With the inclusion of a percentage price cap, manufacturers will be unable to potentially manipulate the market with unwarranted unit costs.

Inventories. We request CARB provide a list of available manufacturers that have market-ready vehicles in the medium- to heavy-duty class sizes, 2B- 8. Availability of model/body types of multiple weight classes (and functions) are not confirmed by fleets but, rather, by manufacturers informing CARB that models will be available.

Thank you for allowing us the opportunity to provide written responses to the proposed ACF Regulations.

Sincerely,

Ed Scofield, Chair  
Board of Supervisors

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/482-acf2022-UDMCawFIUG1RIwN6.pdf>

Original File Name: County of Nevada CARB\_ACF Comments\_April2023\_SIGNED.pdf

Date and Time Comment Was Submitted: 2023-04-06 11:11:28

No Duplicates.

## **Comment 50 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michael

Last Name: Evans

Email Address: mi.ev@hotmail.com

Affiliation: Working people of CA against overregulat

Subject: Against CARB Overregulation

Comment:

My Company has already lost two F-450 Diesel trucks that I had worked for and earned. The CA state even charged me for the registration which I paid. Then, they sent me a non-compliant notice and the DMV would not refund my money.

The California state should buy our trucks at a market value then crush them, that would be fair. Otherwise California forces the companies to sale them to another state where they continue operating - that is not fair.

I don't believe the people writing these rules have any idea what it's like to be a working person who spent years paying off a truck and have it taken from them. Back in the day, if you stole someone's horse that was a death sentence. Now, when you take my horse away, that is a death sentence to my company. The people that write these laws will not get my vote.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-06 11:13:54

No Duplicates.

## **Comment 51 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Stacy

Last Name: Taylor

Email Address: StacyT@MesaWater.org

Affiliation: Mesa Water District

Subject: Draft Advanced Clean Fleets Regulation – Mesa Water Comments

Comment:

Greetings, Mesa Water District is respectfully submitting our comments regarding the Draft Advanced Clean Fleets Regulation via the attached letter. Please feel free to contact us, many thanks.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/484-acf2022-WjldOlAjBzYGX1Q1.pdf>

Original File Name: CARB ACF\_Mesa Water Comment Letter\_April 6.2023.pdf

Date and Time Comment Was Submitted: 2023-04-06 11:28:13

No Duplicates.



## **Comment 52 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Mitch

Last Name: Crosby

Email Address: mitchcrosby@co.modoc.ca.us

Affiliation:

Subject: Negative Impacts to Local Government Services

Comment:

As the Road Commissioner for Modoc County, a large but sparsely populated county with many miles of rural road to maintain, I have many serious concerns about the implementation of the Advanced Clean Fleets Regulations. A few of the most obvious include:

1. Performance: During summer projects and winter snow removal, we have nearly every piece of heavy equipment we own on the job. Often there is a short rest period before the equipment is needed again and sometimes we work split shifts so equipment must be refueled and continue rolling in order to ensure public safety. The technology must accommodate this need before we can successfully convert our fleet.

2. Maintenance & Repair: We have a small staff so we must be able to perform a variety of different responsibilities. Our small mechanic crew currently works on a large variety of vehicles and equipment and their time is consistently booked solid with our maintenance and repair needs. This fleet conversion will require extensive training and create reduced productivity rates, likely creating the need for us to hire additional staff. We will also need to invest in new diagnostic equipment and most likely need to outsource repairs to distant specialists that will likely be overwhelmed with this rapid and widespread implementation.

3. Budget: In addition to the increased costs implied above, we don't have the budget to purchase replacement vehicles within this timeframe. We have many vehicles that are decades old but are still nowhere near being scheduled for replacement. We maintain and operate our equipment with care because we know it will need to last a long time. An accelerated replacement plan will significantly decrease our ability to properly maintain our roadway, which is the primary reason for our existence. Thank you for reconsidering the proposed implementation plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-06 11:20:33

No Duplicates.

## **Comment 53 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Alessandra

Last Name: Magnasco

Email Address: alessandra@cfca.energy

Affiliation: California Fuels & Convenience Alliance

Subject: Modifications to the Advanced Clean Fleets Regulation

Comment:

Please see the attached letter on behalf of the California Fuels and Convenience Alliance.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/486-acf2022-AGNcPARmADJWDwdm.pdf>

Original File Name: CFCA ACF 4.6.23 - FINAL.pdf

Date and Time Comment Was Submitted: 2023-04-06 12:27:48

No Duplicates.

## **Comment 54 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Aaron

Last Name: Lagasse

Email Address: alagasse1@co.humboldt.ca.us

Affiliation: Fleet Services County of Humboldt

Subject: County of Humboldt Comments on the Draft ACF Public Fleets Regulatory Language  
Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/487-acf2022-VTZdNFYiUm9RIwR9.pdf>

Original File Name: County of Humboldt Draft Comments.pdf

Date and Time Comment Was Submitted: 2023-04-06 13:07:34

No Duplicates.

## **Comment 55 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Bradley  
Last Name: Johnson  
Email Address: bjohnson@ntpud.org  
Affiliation: North Tahoe Public Utility District

Subject: North Tahoe Public Utility District Comments on 15-Day Language, Advanced Clean Fleets Reg

Comment:

April 6, 2023 Comment letter submitted via electronic commenting system:

North Tahoe Public Utility District Comments on 15-Day Language, Advanced Clean Fleets Regulation Public Fleet Requirements.

Thank you for your consideration.

Bradley A. Johnson  
North Tahoe Public Utility District  
General Manager/CEO

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/488-acf2022-AmxSIFAhAyUKaANc.pdf>

Original File Name: NTPUD CARB letter ACF Comment Letter 04062023.pdf

Date and Time Comment Was Submitted: 2023-04-06 15:10:44

No Duplicates.

## **Comment 56 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Johanna  
Last Name: Wojciak  
Email Address: Johanna.Wojciak@thelionelectric.com  
Affiliation: Lion Electric

Subject: Comments in Support of the Advanced Clean Fleets Regulation  
Comment:

Dear, Chair Randolph and Members of the California Air Resources Board -

On behalf of Lion Electric Co., we continue to support the Advanced Clean Fleets program that was passed in 2021 by the California State Legislature. We are grateful for your dedication in working toward adopting regulation that would require operators and owners to transition from diesel-powered fleets to zero-emission vehicles.

PLEASE THE LETTER WHICH IS ATTACHED. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/489-acf2022-UT0CbVwyV2pSCwFk.docx>

Original File Name: Lion Electric Co. ZEV Letter Submission for CARB - UPDATED 4 6 23.docx

Date and Time Comment Was Submitted: 2023-04-06 15:25:43

No Duplicates.

## **Comment 57 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Edward

Last Name: McGlone

Email Address: Edward.McGlone@einride.tech

Affiliation: Einride

Subject: Support for amended ACF proposal

Comment:

Please find attached comment from Michelle Avary, Vice President of Government Affairs and Product Strategy submitted on behalf of Einride.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/490-acf2022-UDEBZFII1BAGBZANi.pdf>

Original File Name: ACF CARB Formal Comments 040723.pdf

Date and Time Comment Was Submitted: 2023-04-06 15:44:24

No Duplicates.

## **Comment 58 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Robert

Last Name: Grantham

Email Address: [granthamr@ranchowater.com](mailto:granthamr@ranchowater.com)

Affiliation: Rancho California Water District

Subject: Rancho Water CARB Advanced Clean Fleet Rulemaking Comment Letter

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/491-acf2022-B2EFalI9UmABawZZ.pdf>

Original File Name: Final Rancho Water CARB Advanced Clean Fleet Rulemaking Comment Letter.pdf

Date and Time Comment Was Submitted: 2023-04-06 16:11:38

No Duplicates.

## **Comment 59 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jim

Last Name: Friedl

Email Address: jfriedl@crpd.org

Affiliation: Conejo Recreation & Park District

Subject: CRPD comments on DRAFT ACF Regs (attached)

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/492-acf2022-UDMHc1YnAjUCWwJh.pdf>

Original File Name: CRPD comments to CARB on Draft ACF Regs..pdf

Date and Time Comment Was Submitted: 2023-04-06 16:22:12

No Duplicates.



## **Comment 60 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Elizabeth

Last Name: Leeper

Email Address: eleeper@eid.org

Affiliation: El Dorado Irrigation District

Subject: El Dorado Irrigation District's Comments on Draft Advanced Clean Fleets (ACF) Regulation

Comment:

Please see El Dorado Irrigation District's attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/493-acf2022-Uz4FM1VgWDlQZQkk.pdf>

Original File Name: M0423-006 El Dorado Irrigation District's Comments on Draft Advanced Clean Fleets (ACF) Regulation.pdf

Date and Time Comment Was Submitted: 2023-04-06 16:29:10

No Duplicates.

## **Comment 61 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Patrick

Last Name: Ostly

Email Address: postly@norsd.com

Affiliation: NORSD

Subject: ACF comments

Comment:

Please see attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/494-acf2022-BWsFbFQnUnICYAZZ.pdf>

Original File Name: NORSD - CARB ACF comment letter 4.6.23.pdf

Date and Time Comment Was Submitted: 2023-04-06 16:36:11

No Duplicates.

## **Comment 62 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: David

Last Name: Huey

Email Address: dhuey@ccwater.com

Affiliation: Contra Costa Water District

Subject: Contra Costa Water District Comments on ACF Draft

Comment:

CCWD Comments per attached letter. Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/495-acf2022-B2RSN1UjV2AEXQlq.pdf>

Original File Name: CCWD\_CARB\_ACF\_Comment\_Letter.pdf

Date and Time Comment Was Submitted: 2023-04-06 16:39:22

No Duplicates.

## **Comment 63 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Morgan

Last Name: Caswell

Email Address: morgan.caswell@polb.com

Affiliation:

Subject: San Pedro Bay Ports Comment Letter on the Proposed 15-Day Changes for ACF  
Comment:

Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/496-acf2022-BmxXPgNrBDkDcQFe.pdf>

Original File Name: Joint Ports15 Day ACF Comment Letter FINAL.pdf

Date and Time Comment Was Submitted: 2023-04-06 16:52:22

No Duplicates.

## **Comment 64 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michael

Last Name: O'Kelly

Email Address: mokelly@bellgardens.org

Affiliation:

Subject: Letter of Opposition

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/497-acf2022-BjZRYwEuVDVXYVdl.pdf>

Original File Name: 04.2023 Cal Cities ACF Letter.pdf

Date and Time Comment Was Submitted: 2023-04-06 16:57:02

No Duplicates.

## **Comment 65 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Ray

Last Name: Pingle

Email Address: ray\_pingle@msn.com

Affiliation: Sierra Club California

Subject: Member Comments to Board in Support of Approving the ACF Rule

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/498-acf2022-UiFcM1E1V3YGcgdm.pdf>

Original File Name: Sierra Club CA Member Comments to CARB Board on ACF Rule 4-6-23.pdf

Date and Time Comment Was Submitted: 2023-04-06 17:18:40

No Duplicates.

## **Comment 66 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Katie

Last Name: Saliccioli

Email Address: ksalcicc@ford.com

Affiliation:

Subject: Comments on Proposed Advanced Clean Fleets Regulation

Comment:

We appreciate the opportunity to provide comments to the proposed Advanced Clean Fleets regulation. Please see the attached for our comments. Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/499-acf2022-AWBVNwdwU2EDawZl.pdf>

Original File Name: Advanced Clean Fleets - Ford Comments 6Apr2023.pdf

Date and Time Comment Was Submitted: 2023-04-06 18:03:35

No Duplicates.

## **Comment 67 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Brian  
Last Name: McCarthy  
Email Address: bmccarthy@goletawest.org  
Affiliation: Goleta West Sanitary District

Subject: ACF Regulation Comment Letter  
Comment:

Please find the attached Goleta West Sanitary District comment letter regarding the Draft Advanced Clean Fleets (ACF) Regulation.

Thank you,  
Brian McCarthy  
General Manager/Superintendent  
Goleta West Sanitary District  
PO Box 4  
Goleta, CA 93116-0004  
805-968-2617 fax: 805-562-8987  
bmccarthy@goletawest.org  
www.goletawest.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/500-acf2022-UWMANVVkUDcBNwM1.pdf>

Original File Name: 230406 GWSD signed\_CARB\_ACF\_Comment\_Letter.pdf

Date and Time Comment Was Submitted: 2023-04-06 18:29:19

No Duplicates.



## **Comment 68 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jennifer

Last Name: Goodsell

Email Address: jmgoodsell@iid.com

Affiliation: Imperial Irrigation District

Subject: IID Comment Letter on CARB's proposed 15-Day Language  
Comment:

For your review and consideration, please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/502-acf2022-AWAAdlQnUmgGbAVa.pdf>

Original File Name: April 2023 IID ACF Comment Letter FINAL.pdf

Date and Time Comment Was Submitted: 2023-04-07 07:14:50

No Duplicates.

## **Comment 69 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michael

Last Name: Ochs

Email Address: mochs@rvia.org

Affiliation: RV Industry Association

Subject: RV Industry Association Comments on Advanced Clean Fleet Regulations

Comment:

Please accept attached submission of comments from the RV Industry Association in regard to the modified text of the Advanced Clean Fleets Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/503-acf2022-AnBSIIQ8BzUBWAZn.pdf>

Original File Name: RVIA Advanced Clean Fleet rule comments April 7 2023.pdf

Date and Time Comment Was Submitted: 2023-04-07 07:26:34

No Duplicates.

## **Comment 70 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michael

Last Name: Nguyen

Email Address: mnguyen341@yahoo.com

Affiliation:

Subject: I oppose to Advanced Clean Fleet regulations

Comment:

Please vote NO on the proposed Advanced Clean Fleet regulation.  
This is a job killing proposal that will place heavy burden on the small businesses, increase costs, reduce competition and will lead to job lost and drive small mom and pop stores out of business

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 07:55:13

No Duplicates.

## **Comment 71 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Ka-Wing

Last Name: Poon

Email Address: ka-wing.poon@sce.com

Affiliation:

Subject: SCE Comments on ACF Rule 15-Day Language

Comment:

Please see attached SCE comments on the Advanced Clean Fleets Rule 15-day language.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/505-acf2022-BXYGY1I2Aw8CZQlq.pdf>

Original File Name: SCE ACF 15 Day Changes Comments 2023-04-07.pdf

Date and Time Comment Was Submitted: 2023-04-07 08:09:31

No Duplicates.

## **Comment 72 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Austin

Last Name: Avery

Email Address: asavery@TID.org

Affiliation: Turlock Irrigation District

Subject: TID Comments on Advanced Clean Fleets Regulation

Comment:

Turlock Irrigation District Comments on the Advanced Clean Fleets  
Regulation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/506-acf2022-AnZTPFI3VFgAZQdo.pdf>

Original File Name: TID Comments on Advanced Clean Fleets 15 Day Language for State and  
Local Government Agency Fleet Requirements.pdf

Date and Time Comment Was Submitted: 2023-04-07 08:21:25

No Duplicates.

## **Comment 73 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Andrew

Last Name: Schwartz

Email Address: anschwartz@tesla.com

Affiliation: Tesla, Inc.

Subject: Tesla, Inc.'s comments on 15-day ACF regulations

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/507-acf2022-ViJQMwNxWGdXMFIN.pdf>

Original File Name: Tesla comments on 15-Day ACF regulations.pdf

Date and Time Comment Was Submitted: 2023-04-07 08:15:33

No Duplicates.

## **Comment 74 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Bert  
Last Name: Kaufman  
Email Address: Bert@Range.energy  
Affiliation: Range Energy

Subject: ACF Comments  
Comment:

Please see attached PDF.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/509-acf2022-UjNWIgNgAw8BZANs.pdf>

Original File Name: ARB Comments (1).pdf

Date and Time Comment Was Submitted: 2023-04-07 08:49:30

No Duplicates.

## **Comment 75 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Bascomb

Last Name: Grecian

Email Address: bascombg@gmail.com

Affiliation:

Subject: Californians Love Fossil Fuels-Fuel is essential to economic prosperity

Comment:

This is probably the single worst piece of rulemaking by CARB yet. Why is CARB causing California energy insecurity? When CARB does everything possible to restrict California's fossil fuel production on the blatantly false promise of replacement by unreliable solar and wind, you become dangerously dependent on foreign imported crude products. Skyrocketing oil and gasoline prices are not a failure of the oil industry. They are the total failure of anti-oil politicians, who have artificially restricted the supply of oil with massive restrictions and threats to oil production and transport. The root cause of California's grid's reliability problems is simple: California is shutting down too many reliable power plants--plants that can be controlled to produce electricity when needed in the exact quantity needed. And it is attempting to replace them with unreliable solar and wind.

Reliable Diesel Fuel is essential to the economic vitality of all of California. We need to really rethink these types of rules that hurt all Californians.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:10:56

No Duplicates.



## **Comment 76 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Kyle

Last Name: Berquist

Email Address: kberquist@earthjustice.org

Affiliation: Earthjustice

Subject: Earthjustice supporter comments

Comment:

I'm delivering the comments of 3,052 Earthjustice supporters who are urging CARB to swiftly implement the Advanced Clean Fleets Regulation. Thank you for your time and consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/511-acf2022-VDFRPVEPAyMLeFcn.pdf>

Original File Name: EJ Supporter Comments.pdf

Date and Time Comment Was Submitted: 2023-04-07 09:13:54

No Duplicates.

## **Comment 77 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Paul

Last Name: Miller

Email Address: pmiller@nescaum.org

Affiliation: NESCAUM

Subject: NESCAUM Comments on 15-Day Changes to the Proposed Advanced Clean Fleets Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/512-acf2022-AmwGZQNxBTUFYgZz.pdf>

Original File Name: nescaum-comments-carb-acf-proposed-15-day-changes-20230407.pdf

Date and Time Comment Was Submitted: 2023-04-07 09:38:41

No Duplicates.

## **Comment 78 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Geoff  
Last Name: Crook  
Email Address: gcrook@ceres.org  
Affiliation: Ceres, Inc.

Subject: Businesses Support an Advanced Clean Fleets Rule  
Comment:

Dear Chair Randolph and CARB Board members,

On behalf of Ceres and our coalition partners, I respectfully submit public comment on the draft Advanced Clean Fleets (ACF) regulation. Our diverse coalition of major businesses, institutions, employers, and investors strongly support an ambitious ACF regulation that accelerates electric vehicle deployment at the pace and scale that the climate and public health crises demand. Please see the attached letter representing dozens of companies with footprints in California (and over 38 total states).

Please let me know if you have any questions or would like more information on the perspectives of our member companies.

Sincerely,

Geoff Crook  
Director, West State Policy  
gcrook@ceres.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/513-acf2022-UzECcVIgADoGbgNm.pdf>

Original File Name: Businesses Support an Ambitious Clean Fleets Rule.pdf

Date and Time Comment Was Submitted: 2023-04-07 09:20:49

No Duplicates.

## **Comment 79 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Ellis

Last Name: Chiu

Email Address: ellis.chiu@ladwp.com

Affiliation: Los Angeles Department of Water & Power

Subject: Los Angeles Department of Water and Power Comments on the Advanced Clean Fleets Regulation

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/514-acf2022-Uz9dOI3VnIKfFMM.pdf>

Original File Name: LADWP ACF Comment Letter 15-day Language.pdf

Date and Time Comment Was Submitted: 2023-04-07 09:41:23

No Duplicates.

## **Comment 80 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Kent

Last Name: Swisher

Email Address: kswisher@nara.org

Affiliation: North American Renderers Association

Subject: NARA Comments on Proposed Advanced Clean Fleets (ACF) Regulations

Comment:

The North American Renderers Association comments to the Proposed Advanced Clean Fleets Regulation is attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/515-acf2022-ADIANQBeA2AFNwNc.pdf>

Original File Name: 23 04 07 NARA Letter to Carb.pdf

Date and Time Comment Was Submitted: 2023-04-07 09:43:18

No Duplicates.

## **Comment 81 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Danny

Last Name: weldon

Email Address: danny173452@yahoo.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I urge You To Lower gas taxes, So California's will Be able to survive.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:49:49

No Duplicates.

## **Comment 82 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Harriet

Last Name: Leff

Email Address: kikibriggs@gmail.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

Today I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:50:31

No Duplicates.

## **Comment 83 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Bruce

Last Name: Mitchell

Email Address: ibaminv@gmail.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

Climate Change is THE critical crisis issue of our time and air pollution MUST be drastically reduced as rapidly as possible. NOW is the time to act!

I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:51:01

No Duplicates.



## **Comment 84 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Brenda

Last Name: Lee

Email Address: blee020@ca.rr.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector. While youre at it I also hope to see stronger regulations regarding smoke coming from restaurants and from home fireplaces. I cant even open my windows in the summer because of the pollution in the air. Im also hoping youll address the lead in airplane fuel. How can you possibly allow all the above mentioned air polluters to get away with contaminating the air we breathe? Are you not a representative of California Air Resource Board? PLEASE STOP AIR POLLUTION!!!!

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:51:47

No Duplicates.

## **Comment 85 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Tom

Last Name: Hazelleaf

Email Address: cheapcruiser2003@yahoo.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I would like CARB to make the strongest possible ACF rule. We are running out of time

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:52:27

No Duplicates.

## **Comment 86 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Lana

Last Name: Touchstone

Email Address: lanatouchstone@hotmail.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

As a Californian with asthma, I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:53:11

No Duplicates.

## **Comment 87 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Paul

Last Name: Wermer

Email Address: paul@pw-sc.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

As a chemist, I have been following both climate change science and the impact of air quality on health and well-being. The data is pretty clear - the use of internal combustion engines - regardless of fuel - generates CO<sub>2</sub>, as well as soot and NO<sub>x</sub> - the latter two creating significant AQI problems.

I'm especially concerned about the impact of poor AQI on child development - both physical and mental.

Which is why I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:54:49

No Duplicates.

## **Comment 88 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Samantha

Last Name: Macleod

Email Address: macleod9@sbcglobal.net

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

California has been the leader in environmental action in the past. Therefore I am hoping CARB will take comprehensive and strong action to adopt the strongest possible ACF rule. There is no time to waste in addressing air pollution in our state, especially from the transportation sector!

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:55:24

No Duplicates.

## **Comment 89 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Alan

Last Name: Solomon

Email Address: partnerships@southweststories.us

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

My name is Alan Solomon. I live in southern California.

I completely agree with and strongly support the above statement/petition today and for many years and generations to come.

Thank you for your time Today.

Alan Solomon

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:56:55

No Duplicates.

## **Comment 90 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Robert

Last Name: Cooper

Email Address: Non-web submitted comment

Affiliation:

Subject: Opposition to Proposed Rule Changes

Comment:

Email Address: kildar501@gmail.com

Subject: Opposition to Proposed Rule Changes

Comment:

To the board members:

I'm an O/O that has an older truck. I cannot take lucrative loads to California already due to the emissions requirements. My tractor is paid for and the current freight market cannot support a new truck payment, much less a payment for a slightly used truck. I am intrigued by the ideas coming from Cummins regarding hydrogen powered vehicles but there is a problem with government interference. Mandates from the federal government for EVs by a certain date. Mandates from CARB for ZEVs by a certain date. There seems to be no end to the mandates without any of them taking into consideration the various alternatives being explored and researched by private companies. What if the advances that Cummins makes means I can retrofit my older truck to run on hydrogen in the near future? Will that be allowed in California? According to current rules and proposals, no, it wouldn't. So why would I waste the time and money to make such modifications? The answer is that I wouldn't. What about the e-fuels being developed in Europe by the likes of Porsche? Will those be allowed to be used in vehicles? According to current rules and proposals, no, they wouldn't. The short sighted approach to EVs or nothing will be the ruin of the economy in California and across the country. We need an all encompassing approach to fighting pollution. And why is it that there aren't any regulations being thrown at the airline industry? Some of the cleanest days on record in the last 25 years were after 9/11 when all planes were grounded and when the lockdowns forced millions of people to stay home and not fly or drive their personal vehicles. Yet, the trucking industry is being targeted with laser focus to force us to adopt unproven technology that doesn't have a support infrastructure built for it. How is that fair? The last time we were forced to adopt unproven technology was the boondoggle that was the DEF/DPF systems required after 2008. It took almost a decade to get the bugs worked out of those systems at untold cost. Yet, here we are again looking at the same thing with forcing unproven systems on us. Can we learn from the past and let the free market come up with the solutions this time around?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:55:09

No Duplicates.



## **Comment 91 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Vic

Last Name: DeAngelo

Email Address: phorum@me.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I encourage CARB to please take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 09:58:43

No Duplicates.

## **Comment 92 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Scott

Last Name: Underhill

Email Address: scottdunderhill@live.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution. And as a former CARB employee, I know how important this regulation is to the health and welfare of all citizens of the state of California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 10:01:09

No Duplicates.

## **Comment 93 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Susan

Last Name: Walp

Email Address: susanwalp@gmail.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

Please take comprehensive and strong action to adopt the strongest possible ACF rule. There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of California's pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from heavy-duty trucks as a result of generations of systematic marginalization. This rule would improve air quality in communities of color in close proximity to warehouses and distribution centers while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 10:02:02

No Duplicates.

## **Comment 94 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Nancy

Last Name: Garret

Email Address: nancy1@flownet.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and be a large step towards a more equitable and just future for all.

I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 10:02:27

No Duplicates.

## **Comment 95 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: david

Last Name: bezanson

Email Address: bezanpsy3506@hotmail.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

Set interim goals and target for ZE sales as a percent of total:

a) 2025 - 25%, b) 2030 - 50%

c) 2033 - 70%, d) 2036 - 100%.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 10:02:56

No Duplicates.

## **Comment 96 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Darrell

Last Name: Brown

Email Address: palmettobugg@gmail.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution. (In short ,California should continue Wisely commit unto following Sustainable Stewardship. Our health safety & Security will greatly benefit from this and all other such similar legislation ~ darrell brown ~ The Ravenclaw Reporter

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 10:03:39

No Duplicates.

## **Comment 97 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Nancy

Last Name: Schimmel

Email Address: nancyschimmel@mac.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I had asthma as a child, and I know how scary it is to wake up in the night with not enough breath to call out to my parents. I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 10:04:08

No Duplicates.

## **Comment 98 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Judy  
Last Name: Lukasiewicz  
Email Address: jsteel@cruzio.com  
Affiliation:

Subject: I support the Advance Clean Fleets rule!  
Comment:

I request that CARB take comprehensive and strong action to adopt the strongest ACF rule to help greatly reduce greenhouse gas emissions on all possible levels of transportation, etc. We must address and end greenhouse gas emissions and toxic air pollution, which has formerly and routinely been produced in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and will set targets for 100% electric vehicle (EV) sales by 2036, and hopefully 100% clean-renewable energy generation for infrastructure supporting these vehicles, thereby addressing a large source of Californian pollution and making needed progress towards achieving 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the required, strongest possible ACF rule will also be a step towards a more equitable and just future for all. People inhabiting low-income communities, and communities of color, have been allowed to bear an unfair burden of extremely harmful pollution from transport trucks as a result of generations of systematic marginalization. This rule will serve to improve air quality in communities of color that remain in close proximity to warehouses and distribution centers, all the while generating increases in societal benefits.

Please adopt the strongest version of the ACF rule in order to help California continue to achieve an equitable future free of toxic air pollution.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 10:04:56

No Duplicates.



## **Comment 99 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: david

Last Name: smith

Email Address: trippsmith2004@yahoo.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 10:05:46

730 Duplicates.

## **Comment 100 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Manny

Last Name: Leon

Email Address: mleon@rebuildca.org

Affiliation: California Alliance for Jobs

Subject: ACF Comment Letter - 15 day comment period

Comment:

Attached you will find the ACF comment letter submitted from the California Alliance for Jobs and Rebuild SoCal Partnership. We ask the board to vote no on passing the proposed ACF regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/535-acf2022-VjddOFcwBwsFYAhn.pdf>

Original File Name: ACF\_Comment\_Letter\_4\_7\_23 Final.pdf

Date and Time Comment Was Submitted: 2023-04-07 09:59:20

No Duplicates.

## **Comment 101 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Mike

Last Name: Rohrer

Email Address: fatherfuel@gmail.com

Affiliation:

Subject: Modifications for the Advanced Clean Fleets Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/549-acf2022-BWYHYFIhAjNVfVU5.docx>

Original File Name: CARB.Ltr.04072023.docx

Date and Time Comment Was Submitted: 2023-04-07 10:17:11

No Duplicates.

## **Comment 102 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: William

Last Name: Barrett

Email Address: William.Barrett@Lung.org

Affiliation: American Lung Association

Subject: Support for ACF Proposal

Comment:

Please see attached letter of support for Advanced Clean Fleets  
proposal

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/554-acf2022-VTISIQZpADRXDlQ1.pdf>

Original File Name: Lung Assn\_ACF Support\_4.7.23.pdf

Date and Time Comment Was Submitted: 2023-04-07 10:22:41

No Duplicates.

## **Comment 103 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Elizabeth

Last Name: Bourbon

Email Address: elizabeth.bourbon@valero.com

Affiliation: Valero

Subject: Valero Comments on ACF 15-Day Package

Comment:

Attached please find comments on the ACF 15-day package submitted on behalf of the Valero family of companies.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/557-acf2022-B3FTNFM+BTMAAdFU6.pdf>

Original File Name: Valero Comments on 15-Day Package 04-07-2023.pdf

Date and Time Comment Was Submitted: 2023-04-07 10:10:19

No Duplicates.

## **Comment 104 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Tenille Otero,  
Last Name: Otay Water District  
Email Address: totero@otaywater.gov  
Affiliation: Otay Water District

Subject: Otay Water District Comment Letter on CARB's proposed 15-Day Language  
Comment:

The Otay Water District is submitting our comments via the attached letter. Please feel free to contact us. Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/560-acf2022-VjdRM1cgBzUGblQ3.pdf>

Original File Name: Advanced\_Clean\_Fleets\_Comment\_Letter April 2023 15-day  
Response\_FINAL.pdf

Date and Time Comment Was Submitted: 2023-04-07 10:15:46

No Duplicates.

## **Comment 105 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Prentiss

Last Name: Searles

Email Address: SearlesP@api.org

Affiliation: American Petroleum Institute

Subject: API Comments on Advanced Clean Fleets (ACF) Regulation 15-Day Rulemaking Package

Comment:

Please see API's attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/589-acf2022-UzJVIwdvV1sHYgdo.pdf>

Original File Name: API Comments on ACF 15-day package Final with Attachment.docx.pdf

Date and Time Comment Was Submitted: 2023-04-07 10:02:17

No Duplicates.

## **Comment 106 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Veronica

Last Name: Pardo

Email Address: veronica@resourcecoalition.org

Affiliation: Resource Recovery Coalition of CA

Subject: Waste and Recycling Industry Comments on the Advanced Clean Fleets Rulemaking  
Comment:

We thank you for the opportunity to provide these comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/592-acf2022-AmNQNVQzAzEAdlMh.pdf>

Original File Name: ACFAprilFinal2023.pdf

Date and Time Comment Was Submitted: 2023-04-07 10:53:27

No Duplicates.



## **Comment 107 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Noelle

Last Name: Mattock

Email Address: ncmattock@roseville.ca.us

Affiliation: City of Roseville

Subject: Advanced Clean Fleet Comments by City of Roseville

Comment:

The City of Roseville respectfully submits our comments on the 15-day changes to the Advanced Clean Fleets Rule.

Thank you,  
NCM

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/599-acf2022-UzJTNgFmUS9XYFVg.pdf>

Original File Name: ACF-15 day changes COR Comments(FNL)\_4.7.23.pdf

Date and Time Comment Was Submitted: 2023-04-07 10:48:40

No Duplicates.

## **Comment 108 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Larry

Last Name: Rennacker

Email Address: LarryR@Arrow-tek.com

Affiliation: ArrowTek

Subject: ACF Regulation - Why the Renewable Diesel Hate?

Comment:

There are some critical issues the State of California must address before going down the ACF road as proposed.

It is baffling, if not stunning, why renewable diesel was not presented as an ACF option for diesel vehicles. ARB says the primary driver for the ACF regulation is to reduce greenhouse gas emissions and, for that reason, is mandating diesel vehicles be replaced with ZEVs. ZEV means grid power and right now ~40% of the grid power comes from natural gas fired power plants, and that fraction goes way up when demand it at its highest. But renewable diesel is by definition 100% carbon neutral. If the objective is to reduced greenhouse gases as fast as possible why on earth exclude renewable diesel as an option to ZEVs?

Moreover, putting all your energy supply eggs in one basket (grid power) is a strategic folly. The grid goes down and then what? No transportation system? Allowing renewable diesel diversifies the transportation system making it more robust and less vulnerable to disruption.

I realize ARB has secondary reasons for pushing this regulation: reducing ambient PM 2.5 and ozone. This seems like a stretch. ARB is attacking these two with a slew of other regulations, including amendments to the mobile Off-Road Regulation and the recently adopted, yet to be enforced Heavy-Duty Vehicle inspection and maintenance program, to name a few.

But even assuming PM reductions are essential to this regulation (they are not) PM emissions from diesel engines are lower than PM emissions from gas fired power plants. ARB/EPA emission certification tests for diesel engines show either extremely low (0.002 grams/kWhr) or undetectable PM emissions. Compare that with emissions from natural gas fired power plants at 0.017 grams/kWhr (Argonne National Labs, ANL-20/41, August 2020).

Finally, ARB saying the ACF will reduce NOx and hence ozone. This one is odd because no areas of the state rely on this regulation to meet federal ambient ozone standards. That is, these regions have approved air quality improvement plans to meet federal standards that do include nor rely on the ACF.

So, to sum up. If the goal really is first and foremost to reduce greenhouse gas emissions as fast as possible while supporting a robust transportation system, and while not compromising other air quality goals, it seems like common sense to include renewable diesel as a compliance option for diesel vehicles.

For the record I have no vested interest in renewable diesel.

Regards,  
Larry Rennacker  
ArrowTek

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 10:51:01

No Duplicates.

## **Comment 109 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Rasto

Last Name: Brezny

Email Address: rbrezny@meca.org

Affiliation: MECA

Subject: MECA Comments on CARB's Proposed 15-day ACF Changes

Comment:

please see our association's comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/604-acf2022-VjsAYwZkVWdWD1My.pdf>

Original File Name: MECA\_ACF\_15-day\_Comments\_040723.pdf

Date and Time Comment Was Submitted: 2023-04-07 10:33:22

No Duplicates.

## **Comment 110 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Roxana

Last Name: Ramirez

Email Address: rramirez@mwdh2o.com

Affiliation: Metropolitan Water District

Subject: Metropolitan's Public Comments on the Proposed Advanced Clean Fleets  
Comment:

Please find attached Metropolitan's Public Comments on the Proposed  
15-day Changes to the Advanced Clean Fleets Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/622-acf2022-BWhWJ104WVVVMAVq.pdf>

Original File Name: MWD Comments on 15-Day Advanced Clean Fleet Regulation\_Final  
Signed V.pdf

Date and Time Comment Was Submitted: 2023-04-07 11:19:52

No Duplicates.

## **Comment 111 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Robert

Last Name: Hassebrock

Email Address: robert.hassebrock@weatherford.com

Affiliation: Weatherford

Subject: Advanced Clean Fleet Draft Reg Cleanup

Comment:

While we understand the reason for the regulation, we believe there are some serious flaws as outlined in our comments and believe Staff needs further work with stakeholders before taking this to the Board.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/629-acf2022-AHddPIY2BCMDbQZj.docx>

Original File Name: Weatherford CARB Advanced Clean Fleets Regulation Comments.docx

Date and Time Comment Was Submitted: 2023-04-07 11:19:03

No Duplicates.

## **Comment 112 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Kristian

Last Name: Corby

Email Address: kristian@caletc.com

Affiliation: CalETC

Subject: CalETC's Comments on ACF Rule 15-Day Changes

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/639-acf2022-WzhcOwRpU2VSIFQ3.pdf>

Original File Name: CalETC Comments on 15 Day Language of ACF Rule Draft Final.pdf

Date and Time Comment Was Submitted: 2023-04-07 11:33:53

No Duplicates.

## **Comment 113 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michael

Last Name: Taylor

Email Address: mdtaylor@hillstaffer.com

Affiliation: NAFA Fleet Management Association

Subject: Modified Text for the Advanced Clean Fleets Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/646-acf2022-VzZQJgNwU2IWPANc.pdf>

Original File Name: April 2023 ARB COMMENTS.pdf

Date and Time Comment Was Submitted: 2023-04-07 11:09:24

No Duplicates.



## **Comment 114 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Roxana

Last Name: Ramirez

Email Address: rramirez@mwdh2o.com

Affiliation: Metropolitan Water District

Subject: Metropolitan's Public Comments on the Proposed Advanced Clean Fleets  
Comment:

CARB Staff,

Please find attached Metropolitan's Public Comments on the Proposed  
15-day Changes to the Advanced Clean Fleets Regulation.

Best Regards,

Roxana Ramirez

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/657-acf2022-AWxTIIA1WVUFYAZp.pdf>

Original File Name: MWD Comments on 15-Day Advanced Clean Fleet Regulation\_Final  
Signed V.pdf

Date and Time Comment Was Submitted: 2023-04-07 11:46:17

No Duplicates.

## **Comment 115 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: James

Last Name: Ciampa

Email Address: jciampa@lagerlof.com

Affiliation: Public Water Agencies Group

Subject: Comments on draft Advanced Clean Fleets Regulation (acf2022)

Comment:

Please see the attached comment letter submitted on behalf of the  
Public Water Agencies Group.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/662-acf2022-AWICa1A8BDpQM1c5.pdf>

Original File Name: Comment Letter (PWAG) - Advanced Clean Fleets Regulation (4-7-23).pdf

Date and Time Comment Was Submitted: 2023-04-07 11:02:25

No Duplicates.

## **Comment 116 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jessica

Last Name: Palmer

Email Address: jessica.n.palmer8.civ@us.navy.mil

Affiliation: Navy Region Southwest / DoD

Subject: DoD Comments on Modified Text for Advanced Clean Fleets Regulation

Comment:

Good Afternoon,

On behalf of the military Services in California, please find consolidated Department of Defense (DoD) comments on the California Air Resources Board's (CARB) Modified Text and Availability of Additional Documents for the proposed Advanced Clean Fleets Regulation, attached. We appreciate the opportunity to comment.

Sincerely,

Jessica Palmer

DoD REC 9 Governmental Affairs

Navy Region Southwest

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/683-acf2022-VjJSOWRhAg4KbVIX.pdf>

Original File Name: DoD\_ACF Comments\_15day.pdf

Date and Time Comment Was Submitted: 2023-04-07 12:06:50

No Duplicates.

## **Comment 117 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Tanya

Last Name: DeRivi

Email Address: tderivi@wspa.org

Affiliation: WSPA and AFPM

Subject: WSPA and AFPM Comments on ACF 15-Day Package

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/697-acf2022-B3BSJ1UkVWdXDIU0.pdf>

Original File Name: WSPA AFPM 15-Day Package ACF Comment Letter.pdf

Date and Time Comment Was Submitted: 2023-04-07 12:25:25

No Duplicates.

## **Comment 118 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Dan

Last Name: Ferons

Email Address: danf@smwd.com

Affiliation:

Subject: Comments on Draft Advanced Clean Fleets (ACF) Regulation

Comment:

Please find our comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/714-acf2022-Wm5WfQYwVSsFMQc3.pdf>

Original File Name: 4-7-2023 CARB ZEV Comment Letter.pdf

Date and Time Comment Was Submitted: 2023-04-07 12:43:03

No Duplicates.

## **Comment 119 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: James

Last Name: Johnston

Email Address: jjohnston@autocartruck.com

Affiliation: Autocar, LLC

Subject: Autocar, LLC Comments on 15-Day Notice CARB Advanced Clean Fleets (ACF) Regulations

Comment:

Attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/722-acf2022-VTYBaFQ4V2kFZgRq.pdf>

Original File Name: Comments on 15-Day Notice CARB Advanced Clean Fleets (ACF) Regulations (Proposed Changes to Draft Regulation Language) - Autocar, LLC 04.07.2023 (signed).PDF

Date and Time Comment Was Submitted: 2023-04-07 12:46:49

No Duplicates.

## **Comment 120 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Chris

Last Name: McGlothlin

Email Address: [chris@ccgga.org](mailto:chris@ccgga.org)

Affiliation: California Cotton Ginners & Growers Asso

Subject: ACF - Modified Text 15-Day Comment Period

Comment:

Please find the attached comments on behalf of the signed organizations.

If you have any questions or comments, please contact me at [chris@ccgga.org](mailto:chris@ccgga.org), or by phone at (559)-252-0684.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/725-acf2022-UDFTNgRjBwsGYwhn.docx>

Original File Name: ACF Comments.docx

Date and Time Comment Was Submitted: 2023-04-07 12:51:57

No Duplicates.

## **Comment 121 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Kenley

Last Name: Farmer

Email Address: kfarmer@airlines.org

Affiliation:

Subject: A4A Comments on ACF Modified Proposed Rule

Comment:

Please see attached for comments from Airlines for America in response to the Notice of Public Availability of Modified Text and Availability of Additional Documents for the Advanced Clean Fleets Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/737-acf2022-VmRTZVVmUDAKIQY2.pdf>

Original File Name: 2023-04-07 A4A Comments CARB Adv Clean Fleets Rule\_final.pdf

Date and Time Comment Was Submitted: 2023-04-07 13:01:50

No Duplicates.



## **Comment 122 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Cara

Last Name: Simaga

Email Address: csimaga@stericycle.com

Affiliation: Stericycle

Subject: Comments of Stericycle, Inc. on proposed Advanced Clean Fleet regulation

Comment:

Attached are Stericycle's comments to the proposed Advanced Clean Fleet regulation. Thank you for your consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/743-acf2022-B3RXJVw4VHUBblMw.pdf>

Original File Name: Stericycle comments on CARB ACF 15-day language 4-7-23 w Att\_.pdf

Date and Time Comment Was Submitted: 2023-04-07 13:06:59

No Duplicates.

## **Comment 123 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Timothy

Last Name: Blubaugh

Email Address: avujovic@emamail.org

Affiliation:

Subject: EMA Comments

Comment:

The Truck and Engine Manufacturers Association (EMA) hereby submits comments on the modified text for the proposed Advanced Clean Fleets (ACF) regulation that the California Air Resources Board (CARB) released on March 23, 2023. Included was modified text for the proposed regulation to terminate CARB's Advanced Clean Trucks (ACT) rule and replace it with a regulation that would require manufacturers to sell only zero-emission vehicles (ZEVs) in California.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/747-acf2022-WmhRZ1RnWDgBWFJi.pdf>

Original File Name: 2023 04 07 EMA Comments on CARB ACF 15-Day Notice.pdf

Date and Time Comment Was Submitted: 2023-04-07 13:10:46

No Duplicates.

## **Comment 124 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Nick

Last Name: Blair

Email Address: nickb@acwa.com

Affiliation: ACWA

Subject: ACWA Comments- ACF 15 Day Language State and Local Fleet Requirements  
Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/748-acf2022-VjBTPANsVGZROwdY.pdf>

Original File Name: Final (Logos)\_ACWA Clean Fleets Letter 040723.pdf

Date and Time Comment Was Submitted: 2023-04-07 13:07:29

No Duplicates.

## **Comment 125 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Steven

Last Name: Poncelet

Email Address: stevenponcelet@tdpud.org

Affiliation: Truckee Donner Public Utility District

Subject: Truckee Donner PUD Comment on ACF Public Fleets 15-Day Rule  
Comment:

Attached is public comment detailing the critical role of public electric and water utilities in providing essential services and supporting emergency response and the significant challenges posed by the Public Fleets 15-day rule. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/758-acf2022-BnIAYlQlByEFZwRb.pdf>

Original File Name: TDPUD CARB ACF Comment Letter final 4-7-23.pdf

Date and Time Comment Was Submitted: 2023-04-07 13:13:29

No Duplicates.

## **Comment 126 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Vincent

Last Name: Sullivan

Email Address: vincent@sullivanpetroleum.com

Affiliation:

Subject: Response to Modifications for the Advanced Clean Fleets Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/769-acf2022-AGMHYFQnV2ZQCQVk.pdf>

Original File Name: CARB ACF 2023 Signed.pdf

Date and Time Comment Was Submitted: 2023-04-07 12:48:51

No Duplicates.

## **Comment 127 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Thomas

Last Name: Boylan

Email Address: thomas.boylan@zeta2030.org

Affiliation: Zero Emission Transportation Association

Subject: ACF regulations

Comment:

Please find ZETA's comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/775-acf2022-BnxWNQRxU2EAWVAz.pdf>

Original File Name: ZETA comments on California proposed ACF amendments\_April2023.pdf

Date and Time Comment Was Submitted: 2023-04-07 13:03:02

No Duplicates.

## **Comment 128 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Damon

Last Name: Conklin

Email Address: Dconklin@calcities.org

Affiliation: Cal Cities

Subject: Proposed Advanced Clean Fleet Regulations

Comment:

Please find attached a coalition letter commenting on the proposed regulation from the League of California Cities, California State Association of Counties and the California Special Districts Association.

Thank you in advance for considering this letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/787-acf2022-VTZSO1Y2BzhXOAJ2.pdf>

Original File Name: Coalition ACF Letter 4.7.23.pdf

Date and Time Comment Was Submitted: 2023-04-07 13:41:10

No Duplicates.

## **Comment 129 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Benjamin

Last Name: Palmer

Email Address: benjamin.c.palmer@ehi.com

Affiliation: Enterprise Holdings

Subject: Comments on 15 Day Notice of Modified Advanced Clean Fleets (ACF) Regulation  
Comment:

Please see attached comments on behalf of Enterprise Holdings.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/809-acf2022-B2JSPFQ8U18LIFAP.pdf>

Original File Name: EHI - ACF Comments.pdf

Date and Time Comment Was Submitted: 2023-04-07 14:03:30

No Duplicates.



## **Comment 130 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jesus

Last Name: Martinez Ramirez

Email Address: jramirez@scvwa.org

Affiliation: SCV Water

Subject: Comments on the Proposed 15-day Changes to the Proposed ACF

Comment:

The Santa Clarita Valley Water Agency (SCV Water) appreciates the opportunity to provide public comments to the California Air Resources Board (CARB) in response to the Proposed 15-day Changes to the Proposed Regulation Order Advanced Clean Fleets Regulation State and Local Government Agency Fleet Requirements (Proposed ACF).

SCV Water was created on January 1, 2018, and serves a population of 278,000 through 75,000 retail water connections. Our agency supports the comments and concerns submitted by other public agencies and organizations such as the Association of California Water Agencies (ACWA) and California Municipal Utilities Association (CMUA).

SCV Water believes that the proposed requirements and timelines of the Proposed ACF do not provide public electric, water, and wastewater agencies with a realistic pathway to compliance and jeopardize our ability to respond during emergencies.

SCV Water relies on highly specialized medium- and heavy-duty vehicles to respond to emergencies, restore water service, and prevent disruptions. Our experience in most major disasters (wildfire, earthquakes, etc.) has been that one of the first services to be impacted is the electrical grid and without a functional electric grid a fleet of zero-emission medium- and heavy-duty vehicles would be rendered inoperable. Other emergency services such as firefighting rely upon water agencies to provide extensive support during these critical emergencies. Therefore, the exemptions and requirements of this regulations need to be revised with emergency preparedness in mind.

We offer the following comments and suggestions:

### **Emergency Response Vehicles**

While the regulation has some exemptions, the details and complexity of each exemption make them almost impossible to utilize. The proposed regulation also fails to recognize that certain crews and vehicles do not have set routes and need to be able to operate during extended emergencies. Therefore, public agencies should be allowed to designate some vehicles as emergency support vehicles and receive the same exception as police and fire emergency vehicles.

### **Vehicle Purchase Requirements**

The ZEV Purchase Requirement should not require public agencies to purchase higher weight class vehicles that make it unsafe or more

difficult to operate larger vehicles in work sites or small neighborhoods.

Vehicle downtime and interruption to essential services is one of our biggest concerns; therefore, we have concerns about being required to purchase vehicles from unproven manufacturers that do not have service centers in our area or have the ability to complete recalls and honor battery warranties. Therefore, public agencies should be allowed to request an exemption if they believe the available ZEVs are unsafe or unreliable for the job application.

Vehicle Availability:

- Keeping track of every ZEV manufacturer and model places a significant administrative burden on public agencies, therefore; we believe CARB should be responsible for maintaining a list of available market-ready vehicles and configurations.
- We are also in agreement with the Joint Public Agencies' comment letter that manufacturers should be required to provide a specification sheet for their offered vehicles, including evidence of battery capacity range, fully loaded weight and dimensions, compatibility with and run time of auxiliary equipment where applicable, and payload; a delivery date for the vehicle within 18 months; and a list of service centers.

Infrastructure Exemptions:

SCV Water believes that there are too many variables outside of our control and that it would be very easy for any agency to fall out of compliance and not be eligible to apply for exemptions. Furthermore, most fleets will need to make substantial upgrades to their yards/facilities in order to support zero emissions vehicles. Therefore, we encourage infrastructure extensions to be considered beyond their proposed targets.

We appreciate CARB staff's effort to try to incorporate commentary from various stakeholders in the latest draft and we encourage continued engagement with all stakeholders to ensure that implementation of the proposed ACF considers ongoing challenges and technology limitations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 14:07:08

No Duplicates.

## **Comment 131 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Dan

Last Name: Dunmoyer

Email Address: ddunmoyer@cbia.org

Affiliation: California Building Industry Association

Subject: Advanced Clean Fleet Vehicle Comments -- 15 day  
Comment:

Please find our letter regarding the ACF.

Thank you. D2

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/818-acf2022-VjVSNII6WWsFXFMy.pdf>

Original File Name: CBIA ACF Letter 4 7 2023.pdf

Date and Time Comment Was Submitted: 2023-04-07 14:08:31

No Duplicates.

## **Comment 132 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Ryan

Last Name: Kocher

Email Address: ryan.kocher@knighttrans.com

Affiliation: Knight-Swift Transportation

Subject: Advanced Clean Fleets Regulation - 15-Day Change Comments from Knight-Swift  
Comment:

Please find the attached comment letter from Knight-Swift Transportation regarding the latest 15-day changes to the proposed Advanced Clean Fleets Regulation.

Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/820-acf2022-BTdUYlxvVzcKPacz.pdf>

Original File Name: 20230407\_CARB ACF Comments\_KNX.pdf

Date and Time Comment Was Submitted: 2023-04-07 13:28:43

No Duplicates.

## **Comment 133 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Elisabeth

Last Name: de Jong

Email Address: edejong@scppa.org

Affiliation: SCPPA

Subject: Joint NCPA, SCPPA, CMUA Comments on ACF Rule 15-Day Changes

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/824-acf2022-UTsBaFM7VWhXJVAP.pdf>

Original File Name: Joint Public Agency ACF Comment Letter and Redlines\_April2023.pdf

Date and Time Comment Was Submitted: 2023-04-07 14:15:39

No Duplicates.

## **Comment 134 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Robert

Last Name: Crawford

Email Address: robert.crawford@ventura.org

Affiliation: County of Ventura GSA Fleet Services

Subject: Advanced Clean Fleet Regulations - Response

Comment:

Attached please find the public comment response from the General Services Agency of the County of Ventura to the Advanced Clean Fleet Regulations

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/836-acf2022-B2QBaFMnVmsDcVlr.pdf>

Original File Name: County of Ventura GSA - ACF Comment Letter.pdf

Date and Time Comment Was Submitted: 2023-04-07 14:24:17

No Duplicates.

## **Comment 135 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Suzanne  
Last Name: Seivright-Sutherland  
Email Address: sseivright@calcima.org  
Affiliation: CalCIMA

Subject: CalCIMA comments - ARB ACF high priority and federal fleets and LER  
Comment:

Good afternoon,

Attached please find CalCIMA's comments regarding California Air Resources Board's proposed 'Advanced Clean Fleets' regulation.

Kindest regards,  
Suzanne Seivright-Sutherland  
CalCIMA

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/853-acf2022-UTJdOgNuUWEGaQlk.pdf>

Original File Name: CalCIMA comments - CARB proposed ACF regulation 4-7-2023.pdf

Date and Time Comment Was Submitted: 2023-04-07 14:34:40

No Duplicates.

## **Comment 136 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: James

Last Name: Takehara

Email Address: jtakehara@cityofshastalake.org

Affiliation: City of Shasta Lake

Subject: Comments on Proposed Advanced Clean Fleets Regulation

Comment:

Thank you for this opportunity to comment. Please see attached.  
Thank you for your consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/855-acf2022-UT0GZQRxVHMKaQd1.pdf>

Original File Name: Letter ACF 15Day 2023 04.pdf

Date and Time Comment Was Submitted: 2023-04-07 14:42:21

No Duplicates.



## **Comment 137 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Becky

Last Name: Bucar

Email Address: bbucar@townoftruckee.com

Affiliation: Town of Truckee

Subject: Advanced Clean Fleets Regulations - Public Comment - Town of Truckee  
Comment:

The Town of Truckee appreciates the opportunity to provide comments on the ACF draft regulatory language (March 23 iteration) for public fleets as proposed by California Air Resources Board (CARB) staff. Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/858-acf2022-AGMHYAFyU2JWDwJm.pdf>

Original File Name: CARB Draft Advanced Clean Fleets 4.7.23.pdf

Date and Time Comment Was Submitted: 2023-04-07 13:58:39

No Duplicates.

## **Comment 138 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Chris

Last Name: Shimoda

Email Address: cshimoda@caltrux.org

Affiliation: California Trucking Association

Subject: Joint 15-Day CTA-ATA Comments

Comment:

Please see attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/863-acf2022-VGZUYgAzB2dReVAz.pdf>

Original File Name: 2023.CTA-ATA.ACF 15 day Comments Final.pdf

Date and Time Comment Was Submitted: 2023-04-07 14:50:11

No Duplicates.

## **Comment 139 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Sarah

Last Name: Taheri

Email Address: staheri@sdge.com

Affiliation: San Diego Gas & Electric (SDG&E)

Subject: SDG&E Comments on the Proposed 15-Day Revisions to the Dr Advanced Clean Fleets Regulation

Comment:

Attached please find San Diego Gas & Electric's comments on CARB's proposed 15-day revisions to the draft Advanced Clean Fleet regulations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/866-acf2022-B2FcM1M8BDZSOAdY.pdf>

Original File Name: Final\_SDGE\_ACF\_Comments\_040723.pdf

Date and Time Comment Was Submitted: 2023-04-07 13:55:29

No Duplicates.

## **Comment 140 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Karen

Last Name: Goh

Email Address: Mayor@bakersfieldcity.us

Affiliation: Mayor, City of Bakersfield

Subject: City of Bakersfield Draft ACF Public Fleets Regulatory Language

Comment:

The City of Bakersfield appreciates the opportunity to comment on the California Air Resources Board's (CARB) Advanced Clean Fleets (ACF) draft regulatory language (March 23 iteration). The city seeks clarity on several items. We also have serious concerns about aggressive timelines, which due to local budget cycles, are simply unattainable.

We are grateful for the collaborative workshops held by CARB to discuss our concerns and for providing feedback on some of our suggestions. While the latest iteration reflects some of the exemptions and extensions that we requested, we remain concerned with the following:

**Lack of Price Caps.** We recommend that CARB consider imposing price caps to ensure the market responds positively with vehicles at competitive rates. Local governments strive to be good stewards of the taxpayer's dollars, but without price caps, the proposed regulations may result in zero-emission vehicles that are put to market at an artificially inflated rate. A percentage price cap would potentially prevent manufacturers from manipulating the market and help local governments protect taxpayer resources.

**Inventories.** We believe that CARB should provide a list of available manufacturers that have market-ready vehicles in the medium- to heavy-duty class sizes, 2B-8. Availability of model/body types of multiple weight classes (and functions) are not confirmed by fleets, but rather by manufacturers informing CARB which models will be available.

**Timelines and Public Funding.** The proposed regulations continue to impose aggressive timelines for compliance. They do not consider public budgets and funding methods for capital projects. Many local governments follow a two-year budget cycle, and many cities have a five-year capital budget cycle that cannot be easily repurposed at the scale this proposed regulation would require. Requiring compliance to start on Jan. 1, 2024, would require significant and immediate investment from local budgets for the preconstruction that is simply unattainable. Electrifying service yards to support an electrified fleet is a much greater undertaking than a simple electricity panel upgrade or some quick trenching in the parking lot. The time and costs for planning, engineering, and expansion of both the electrical capacity of a facility's system and the distribution system that feeds it are well beyond the available budget of cities. While savings will eventually manifest from retiring or repurposing internal combustible engine assets, they will have no effect on the upfront expenses. For these reasons, we

believe that local governments need an extension of at least four years from regulation adoption.

The proposed regulations ignore existing market realities, as well as the time needed to develop and ramp up an infrastructural system that can support an electrified fleet of waste, water, and sewer utility vehicles. If required to comply with the proposed regulation as drafted, the projected infrastructure and fleet costs will add substantial rate increases across multiple public works and utility service departments.

In Bakersfield there are approximately 384 vehicles that could be affected by this regulation. To transition from our current infrastructure (LNG and CNG) to electric or hydrogen would take considerable planning and funding. The City has spoken with vendors who have indicated that the phase 3 version of refuse trucks will not be out to market until later this year and is estimated to be limited to a restrictive 1,100 stops and 100 miles. Until we can test these vehicles ourselves, we cannot be certain they will meet our current needs without major changes to programs or staffing.

This proposed regulatory language fails to account for rising utility costs, substantial mandates from multiple regulatory bodies, market realities, budget deficits, and affordability issues facing our residents.

Again, thank you for allowing us the opportunity to provide written responses to the proposed Advance Clean Fleets Regulations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/879-acf2022-UmZXf1BmVCkKPgIx.pdf>

Original File Name: 4.7.23 Mayor Goh Letter to CARB - Public Fleet Regulations.pdf

Date and Time Comment Was Submitted: 2023-04-07 15:02:35

No Duplicates.

## **Comment 141 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Tom

Last Name: Trott

Email Address: ttrott@twainhartecsd.com

Affiliation: Twain Harte CSD

Subject: Comments on Draft Advanced Clean Fleets Regulation

Comment:

Please see attached letter for comments from Twain Harte Community Services District.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/882-acf2022-UDwAclQnU18EYVMY.pdf>

Original File Name: LTR\_CARB\_Advanced Clean Fleets Comments\_2023-04-07.pdf

Date and Time Comment Was Submitted: 2023-04-07 15:04:41

No Duplicates.

## **Comment 142 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Mike

Last Name: Heller

Email Address: mheller@rleparks.com

Affiliation: Rio Linda Elverta RPD

Subject: Comments on Draft Advanced Clean Fleets (ACF) Regulation

Comment:

The Rio Linda Elverta Recreation and Park District appreciates the opportunity to provide comments on the ACF draft regulatory language (March 23 iteration) for public fleets as proposed by California Air Resources Board (CARB) staff. While the latest iteration of the ACF regulation reflects some of the exemptions and extensions that have been requested, we remain seriously concerned with the following and must request further amendments accordingly:

**Timelines and Public Funding.** The proposed regulations continue to impose aggressive timelines for public fleets to comply and do not consider existing local agency budget constraints and funding methods for capital projects.

Many local governments budget every two years, and many have a five-year capital budget cycle that cannot be easily repurposed at the scale this proposed regulation would require. Mandating compliance to start January 1, 2024, for a proposed regulation that would require significant and immediate investment and allocation from local agency budgets for the preconstruction, site preparation, and coordination with energy providers is simply unattainable.

Electrifying service yards to support an electrified fleet is a much greater undertaking than a simple electricity panel upgrade or some quick trenching in the parking lot. Upgrading infrastructure, purchasing vehicles, training workforce, and complying with mandated reports is not something local agencies can easily comply with. Inflation and other cost increases have already stretched budgets to their limits.

The proposed regulation also ignores existing market realities and the time needed to develop and ramp up an infrastructural system that can support an electrified fleet of essential vehicles. If required to comply with the proposed regulation as drafted, the projected infrastructure and fleet costs will add substantial rate increases across multiple public works and utility service departments. There is no current funding for these increased costs. It will take at least a year to put together a funding plan and then could take another year or more to place new taxes on the ballot or hold Proposition 218 protest proceedings. If voters reject such tax and fee increases, local agencies will be left with no resources to afford the immediate up-front costs necessary to comply with the regulation.

While savings may eventually manifest from retiring or repurposing

assets oriented to internal combustion engines (ICE), they will have no effect on the upfront capital expenses. For these reasons, we believe that local governments need an extension of at least four years from regulation adoption and we encourage the State of California to develop a substantial grant program to support local governments in complying without imposing an undue burden upon their ratepayers and taxpayers already struggling to make ends meet at this time of high inflation.

**Exemptions.** Local agency vehicles essential to the health and safety of residents should be fully exempt from the regulation. While some of these vehicles are captured under the current emergency vehicle exemption, it should be expanded.

In addition to emergency vehicles currently defined in the California Vehicle Code, the following local agency vehicles must be operable 24 hours per day, 365 days per week. Any interruption in their regular use could jeopardize the health and safety of the communities they serve. Given the most likely current or future ZEV options will depend upon a consistently accessible source of electricity, the risk of disruption whether due to an earthquake, public safety power shutoff, rolling brownout, wildfire, flood, or other natural disaster is too great to risk the operability of these vehicles and health and safety of Californians:

- Valve trucks, welding trucks, and other vehicles essential to the repair and maintenance of water, wastewater, and other utilities. These are particularly critical during and following the very events that could interrupt the ability of ZEVs to operate.
- Vehicles used by open space, regional park, and other agencies to spot wildfires, mitigate wildfires, rescue lost or injured hikers, and prevent poaching of animals.
- Vehicles used by mosquito abatement and vector control agencies to prevent and disrupt the proliferation and uncontrolled spread of dangerous known and unknown vectors.

In addition, we are requesting a Small Agency/Department automatic exemption based on fiscal hardship. We also request you expand the existing delayed implementation for small vehicle fleets in non-designated (non-low population) counties to include agencies that purchase less than two vehicles in a calendar year. Otherwise, the current "rounding up" rule would apply the regulation to 100% of vehicles purchased by agencies purchasing just one vehicle in the initial three-year implementation period even though that period is intended to only require 50% of vehicles comply. Agencies purchasing just one vehicle in a calendar year are the smallest agencies in the state that are leased capable to comply with the reporting mandates and costs associated with the regulation. Moreover, in purchasing just one vehicle an agency has no means to mitigate the added cost of ZEV additions as an agency purchasing multiple vehicles can by strategically purchasing 50% ICE vehicles for the vehicle models that may be least affordable as ZEVs.

**Price Caps.** We request that CARB impose price caps to ensure the market positively responds with vehicles at competitive rates. Local governments strive to be good stewards of the taxpayer's dollars, but without price caps, complying with the proposed regulations may force a purchase of ZEVs that are put to market at an artificially inflated rate. With the inclusion of a percentage price cap, manufacturers will be unable to potentially manipulate the market with unwarranted unit costs.



Inventories. We request CARB provide a list of available manufacturers that have market-ready vehicles in the medium- to heavy- duty class sizes, 2B- 8. Availability of model/body types of multiple weight classes (and functions) are not confirmed by fleets, but rather by manufacturers informing CARB that models will be available.

Again, thank you for allowing us the opportunity to provide written responses to the proposed ACF Regulations.

Sincerely,

Mike Heller  
General Manager  
Rio Linda Elverta Recreation and Park District

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/897-acf2022-B2RXMFQnADEGXwNi.pdf>

Original File Name: CARB ACF Comments..pdf

Date and Time Comment Was Submitted: 2023-04-07 15:17:38

No Duplicates.

## **Comment 143 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Ed

Last Name: Ward

Email Address: ed.ward@vpps.net

Affiliation:

Subject: Opposition to ACF

Comment:

I am writing in opposition to the approval of the Advanced Clean Fleets rule. The most recent changes validate CARB's inability to push Zero Emissions requirements. Vehicle Delivery Extension, Infrastructure Delay Extension, Construction Delays Extension, Construction Delay Extension, Site Electrification Delay. All infrastructure extensions to onerous and detailed to be easily used and applied. All responsibility/ reporting is put on vehicle owners. Municipalities, Contractors, and Utilities are not held accountable... reporting requirements should be done by the agencies who hold power to change.

In 2021, California had 15,859,736 private and commercial truck registrations. According to CARB's presentations CARB Staff estimates that 1.8 M medium and HD vehicles are operating in CA; of that number, 532,000 will be subject to ACF. By 2050 CA should have 1.6 M medium & HD trucks. Why is there a discrepancy between CARB and DMV registrations?

Incentives offered are only a tiny percentage of the actual cost of heavy-duty ZEV mandates. ACF's requirements will cripple freight movement in California. It will also substantially increase the cost of goods, ultimately leaving our lowest-income families with little hope of being able to pay for rent, food, medicine, and transportation.

I am supportive of leaving this earth better than I found it. In my 65 years in California, I have seen the worst of air quality. We are not living in an era of the "worst air quality" Unfortunately, the very families we want to help will be ground zero for hopelessness.

I request that the CARB Board reevaluate its position regarding ACFs, and what can occur without extensions. The focus should be on getting this done with Municipalities, Contractors, Suppliers, and Utilities. When it works, it will simply benefit every Californian.

Respectively Submitted

Ed Ward

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 15:24:56

No Duplicates.

## **Comment 144 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Pacal  
Last Name: Cornejo-Reynoso  
Email Address: cornejop@emwd.org  
Affiliation: Eastern Municipal Water District

Subject: EMWD Comments on 15-Day Proposed Advanced Clean Fleets Language  
Comment:

April 7, 2023

Mr. Tony Brasil  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Mr. Craig Duehring  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Mr. Paul Arneja  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: EMWD Comments on 15-Day Proposed Advanced Clean Fleets  
Language

Mr. Tony Brazil, Mr. Craig Duehring, and Mr. Paul Arneja:  
On behalf of Eastern Municipal Water District (EMWD), a water, wastewater, and recycled water provider serving nearly one million residents in western Riverside County, I am writing to make you aware of significant concerns that EMWD has identified in the 15-day proposed language of the California Air Resources Board (CARB) Advanced Clean Fleets (ACF) rule. EMWD is generally supportive of the State's climate goals and it is the intent of these comments herein to provide CARB staff with feedback, which if considered, would make the rule more implementable for public agencies. EMWD must ensure that we can continue to provide a high quality of service in all circumstances. As the ACF rule is currently written, certain provisions would limit the use of EMWD's fleet in both routine and emergency situations.

EMWD has identified three primary concerns with the ACF rule. First, the rule could result in publicly owned electric utilities and public water and wastewater agencies needing to use vehicles beyond their useful life or replace them with a ZEV that does not have adequate capabilities to restore service, maintain reliability, and respond in emergencies. The proposed regulation provides three exemptions that attempt to provide flexibility: a Daily Usage Exemption, Zero-Emission Vehicle (ZEV) Purchase Exemption, and ZEV Fueling Infrastructure Exemption. These exemptions, however, are severely limited because they can only be used for vehicles that are 13 years or older. Data submitted to

CARB shows a typical utility vehicle lifespan is 7-10 years, given the heavy usage.

Additionally, the daily usage exemption is underpinned by a skewed energy usage formula. The rule includes a daily usage exemption (which, as noted above, is currently restricted for use to replace vehicles that are 13 years or older) that could allow a publicly owned utility to purchase a traditional utility vehicle if the ZEV configuration does not meet the daily needs of the utility. To determine daily needs, there is a 60-month look-back assessment that requires fleets to discard the highest three energy usage days for a vehicle, which could prove to be problematic in fully assessing the capabilities needed for a particular vehicle. As an example, if a utility vehicle is deployed to restore service after a wildfire or earthquake for three days, those three days should be factored into the formula as an accurate representation of the vehicle's usage.

Lastly, the issue of vehicle availability remains a priority issue for EMWD. The lack of medium-heavy duty ZEV vehicles in the market will impact an agency's ability to reliably maintain service. There are a limited number of manufacturers actively producing equipment in this range. While manufacturers may claim production or near production readiness of certain vehicle types, actual production capability to meet even limited demand is far from mature and in some cases does not exist at any reasonable scale at all. This is further exacerbated by the cancelation of ZEV purchase contracts by manufacturers. Fleets are provided one-year to enter into a new ZEV contract if a vendor cancels an existing order. EMWD has observed these cancellations even with the purchase of Internal Combustion Engine (ICE) vehicles where dealers are failing to meet extended delivery schedules and manufacturers are cancelling orders. Additionally, an exemption cannot then be acquired to purchase an available ICE powered vehicle if a vendor claims availability of a new unit model within 18 months. This further delays the delivery of a needed vehicle for maintaining critical public infrastructure.

EMWD appreciates the opportunity to comment on this proposed rule and would like to reiterate that we are supportive of a reasonable ACF ruling. As climate change worsens and weather events become more extreme, EMWD acknowledges the need to limit greenhouse gas emissions. However, this initiative should not impact a public utility's ability to provide essential services to their customers and the communities that they support. We encourage CARB staff to continue analyzing the potential impacts to public fleets across the state. If you have any questions or if EMWD could be of service, please feel free to contact me at (951) 928-6130, or by email at [mouwadj@emwd.org](mailto:mouwadj@emwd.org).  
Sincerely,  
Joe Mouawad, P.E.  
General Manager

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/909-acf2022-VjMGbVAmADdRCFIx.pdf>

Original File Name: EMWD Comments on CARB ACF Rule (EDITED).pdf

Date and Time Comment Was Submitted: 2023-04-07 15:27:28

No Duplicates.

## **Comment 145 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Tim

Last Name: Vander Pol

Email Address: vanderpol.tim@gmail.com

Affiliation: Peninsula Truck Lines, Inc.

Subject: Proposed Advanced Clean Fleets Regulation

Comment:

We strongly oppose this proposal. Although we believe in the stewardly use of our resources, we don't believe that the rush to ZEV is achievable in the timelines outlined nor is it without other significant negative environmental impacts (mining, battery disposal and lack of Zero Emission Power to supply the electricity).

This is too much, too fast, with little regard for feasibility or the long term consequences of these changes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 15:28:10

No Duplicates.

## **Comment 146 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Sarah

Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: California Association of Sanitation Age

Subject: CASA Comments on the Proposed 15-Day ACF Regulations

Comment:

The California Association of Sanitation Agencies appreciates the opportunity to provide comments on the Proposed Advanced Clean Fleets (ACF) Regulations 15-Day changes released March 23, 2023. We remain committed to working collaboratively with you on these critical efforts, as we prioritize resilient essential public service operations to protect public health and the environment. Please contact me with any questions at sdeslauriers@carollo.com or at 925-705-6404.

Regards,

Sarah Deslauriers, PE, ENV SP

CASA Climate Change Program Manager

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/924-acf2022-WjlRNgFzVWcDWgRi.pdf>

Original File Name: CASA Formal 04-07-23 Comments\_ACFRegs032323\_FINAL.pdf

Date and Time Comment Was Submitted: 2023-04-07 15:35:51

No Duplicates.



## **Comment 147 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Michael

Last Name: Downs

Email Address: mike.downs@downsenergy.com

Affiliation:

Subject: Oppose Letter - Advanced Clean Fleets Regulation

Comment:

Please see attached letter of opposition for the Advanced Clean Fleets Regulation.

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/927-acf2022-UzxXIVEgBDgBdFUw.pdf>

Original File Name: Oppose Letter to CARB - Modifications to Advanced Clean Fleets 2023-04-07.pdf

Date and Time Comment Was Submitted: 2023-04-07 15:40:30

No Duplicates.

## **Comment 148 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Leslie

Last Name: Bryan

Email Address: labryan@cityofredding.org

Affiliation: City of Redding

Subject: City of Redding Comments on ACF Rule 15-Day Language

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/929-acf2022-VjVSPQZzWXMBWFI9.pdf>

Original File Name: City of Redding Comments on ACF 15-Day Language.pdf

Date and Time Comment Was Submitted: 2023-04-07 15:40:29

No Duplicates.

## **Comment 149 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Matt

Last Name: Schrap

Email Address: matt@harbortruckers.org

Affiliation: Harbor Trucking Association

Subject: ACF 15-Day Change Language (acf22)

Comment:

Please see attached for Comments By the Harbor Trucking Association.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/930-acf2022-AjNQY1AOVWIFY1Us.pdf>

Original File Name: 15 Day Final.pdf

Date and Time Comment Was Submitted: 2023-04-07 15:43:03

No Duplicates.

## **Comment 150 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Dominique

Last Name: Bertrand

Email Address: DBertrand@mcwd.org

Affiliation:

Subject: Comments on Draft ACF Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/932-acf2022-B2QFY1Y1WWgAWVMy.pdf>

Original File Name: CARB\_AdvancedCleanFleet\_CommentLetter.pdf

Date and Time Comment Was Submitted: 2023-04-07 15:45:05

No Duplicates.

## **Comment 151 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Rebecca

Last Name: Baskins

Email Address: rbaskins@kscsacramento.com

Affiliation: CABA

Subject: CABA ACF Comment Letter

Comment:

Comment letter is attached.

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/940-acf2022-UjEFYIMwWWtWDwRl.pdf>

Original File Name: CABA ACF Comment Letter.pdf

Date and Time Comment Was Submitted: 2023-04-07 15:26:08

No Duplicates.

## **Comment 152 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Orville

Last Name: Thomas

Email Address: othomas@calstart.org

Affiliation: CALSTART

Subject: CALSTART 15-day comments on ACF Modified Text

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/945-acf2022-B2QFYgRpWXIVJ1Ax.pdf>

Original File Name: CALSTART ACF 15-Day comment.pdf

Date and Time Comment Was Submitted: 2023-04-07 15:56:21

No Duplicates.

## **Comment 153 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Anna

Last Name: Maubach

Email Address: amaubach@kscsacramento.com

Affiliation:

Subject: ACF Comment Letter

Comment:

Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/946-acf2022-UDNSNVAjADFSCwdm.pdf>

Original File Name: CARB ACF Coalition Letter\_.pdf

Date and Time Comment Was Submitted: 2023-04-07 15:56:04

No Duplicates.

## **Comment 154 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: adam

Last Name: browning

Email Address: abrowning@forummobility.com

Affiliation:

Subject: ACF comments Forum Mobility, TeraWatt Infrastructure, EV Realty

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/952-acf2022-AmMBZFA3BwsAagNm.pdf>

Original File Name: ACF letter Forum\_TeraWatt\_EVRealty.pdf

Date and Time Comment Was Submitted: 2023-04-07 16:00:56

No Duplicates.



## **Comment 155 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Nicole

Last Name: Looney

Email Address: nicole.looney@smud.org

Affiliation: SMUD

Subject: SMUD's Comments on Proposed 15-Day Changes for the Advanced Clean Fleets Regulation

Comment:

SMUD's Comments on Proposed 15-Day Changes for the Advanced Clean Fleets Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/959-acf2022-BXYFblQgUmUCWwZl.pdf>

Original File Name: SMUD Comments ACF 15-Day Changes - LEG 2023-0048.pdf

Date and Time Comment Was Submitted: 2023-04-07 16:05:38

No Duplicates.

## **Comment 156 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jesica

Last Name: Cleaver

Email Address: jcleaver@sdewa.org

Affiliation: San Diego County Water Authority

Subject: Comments on the proposed Advanced Clean Fleets Rule public fleet requirements

Comment:

Please find attached comments from the San Diego County Water Authority and its member agencies. Please feel free to reach out to me if you have any questions.

Thank you,  
Jesica Cleaver  
jcleaver@sdewa.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/963-acf2022-VWcCNFBjBGQFLgc3.pdf>

Original File Name: 2023-04-07 ACF Public Fleet Comments.pdf

Date and Time Comment Was Submitted: 2023-04-07 16:04:12

No Duplicates.

## **Comment 157 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Salpy

Last Name: Kabaklian-Slantz

Email Address: skabaklianslantz@norwalkca.gov

Affiliation: City of Norwalk

Subject: City of Norwalk's Comments on the Draft ACF Public Fleets Regulatory Language  
Comment:

Please find attached Norwalk's Comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/967-acf2022-UzBWPwZqWGYLaAln.pdf>

Original File Name: Comments Letter for Draft ACF Public Fleets Regulatory Language.pdf

Date and Time Comment Was Submitted: 2023-04-07 16:12:48

No Duplicates.

## **Comment 158 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Mary Alyssa

Last Name: Rancier

Email Address: rancierm@agc-ca.org

Affiliation: Associated General Contractors of Califo

Subject: Comments on Advanced Clean Fleets Regulation: High Priority and Federal Fleet Requirements

Comment:

Please see the attached document for our comment.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/977-acf2022-BWNXOAZpUGJWPFAP.pdf>

Original File Name: FINAL ACF Comment Letter 4.7.23.pdf

Date and Time Comment Was Submitted: 2023-04-07 16:22:20

No Duplicates.

## **Comment 159 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Samuel

Last Name: Bayless

Email Address: samuel.bayless@nikolamotor.com

Affiliation:

Subject: Nikola ACF Comment

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/992-acf2022-UyNcKVluAjJQCm0D.pdf>

Original File Name: Nikola ACF Comments 4.7.23.pdf

Date and Time Comment Was Submitted: 2023-04-07 16:46:02

No Duplicates.

## **Comment 160 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: LEE

Last Name: BROWN

Email Address: LEEBROWN@WESTRK.ORG

Affiliation:

Subject: WESTERN STATES TRUCKING ASSN COMMENTS ON ACF 15-DAY  
Comment:

Please review the attachment.  
Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/998-acf2022-UCcAdVwpVWdXDgZl.pdf>

Original File Name: WSTA Comments on ACF Regulation-April 7 2023.pdf

Date and Time Comment Was Submitted: 2023-04-07 16:49:22

No Duplicates.

## **Comment 161 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jim

Last Name: McCaslin

Email Address: jim.mccaslin@yahoo.com

Affiliation:

Subject: Modifications to the Advanced Clean Fleets Regulation

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1016-acf2022-VzZVMAFmWWUDdVMj.docx>

Original File Name: ACFOppose.docx

Date and Time Comment Was Submitted: 2023-04-07 17:07:18

No Duplicates.

## **Comment 162 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Chelsea

Last Name: Lee

Email Address: chelsea@betterworldgroup.com

Affiliation: Advanced Clean Fleets Advocacy Coalition

Subject: Support for the ACF Rule

Comment:

On behalf of environmental justice, labor, public health, scientific, business and environmental groups and our thousands of members across the State, we urge the California Air Resources Board to adopt the proposed Advanced Clean Fleets Rule. This rule will produce significant benefits to public health, climate action, and economic and environmental justice and is a necessary but partial step to achieving the state's climate goals.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1064-acf2022-VDVXMgZhAAwBZAlm.pdf>

Original File Name: ACF Coalition Letter FINAL.docx.pdf

Date and Time Comment Was Submitted: 2023-04-07 17:19:22

No Duplicates.



## **Comment 163 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Marisa

Last Name: Olguin

Email Address: molguin@vernonchamber.org

Affiliation: Vernon Chamber of Commerce

Subject: Proposed Advanced Clean Fleet Regulations - Recommendation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1066-acf2022-AmFQPIQ0Az0AZFM2.pdf>

Original File Name: Chamber Support Letter - Baker Commodities\_CARB.FINAL.pdf

Date and Time Comment Was Submitted: 2023-04-07 17:47:20

No Duplicates.

## **Comment 164 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Marianna

Last Name: Contact

Email Address: mspillover@gmail.com

Affiliation:

Subject: I support the Advance Clean Fleets rule!

Comment:

I urge CARB to take comprehensive and strong action to adopt the strongest possible ACF rule! There is no time to waste in addressing air pollution in our state, especially from the transportation sector.

A strong ACF rule implements a zero-emission purchase requirement for fleets of medium and heavy-duty trucks and would set targets for 100% electric vehicle (EV) sales by 2036, addressing a huge source of Californian pollution and making great progress towards achieving Gov. Newsoms executive order that requires 100% of heavy-duty truck fleets in California to be zero-emission by 2045.

Adopting the strongest possible ACF rule would also be a large step towards a more equitable and just future for all. Low-income and communities of color bear an unfair burden of harmful pollution from these trucks as a result of generations of systematic marginalization and this rule would improve air quality in communities of color in close proximity to warehouses and distribution centers all the while generating more than \$10 billion in societal benefits.

Please, make sure to adopt the strongest version of the ACF rule and help California achieve an equitable future free of air pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 17:49:03

No Duplicates.

## **Comment 165 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Carolina

Last Name: Herrera

Email Address: [cherrera@rivco.org](mailto:cherrera@rivco.org)

Affiliation: County of Riverside

Subject: Riverside County Comments on Advanced Clean Fleets Regulations

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1079-acf2022-AWIAZwNwVWQLUgl7.pdf>

Original File Name: CARB Reg Comments.2023.04.07.pdf

Date and Time Comment Was Submitted: 2023-04-07 17:58:16

No Duplicates.

## **Comment 166 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Yazmin

Last Name: Arellano

Email Address: yarellano@elcajon.gov

Affiliation: City of El Cajon

Subject: City of El Cajon Comments on Proposed Advanced Clean Fleet Regulation

Comment:

Good afternoon,

Please accept our comment letter regarding the proposed Advanced Clean Fleet regulations.

Respectfully submitted,

Yazmin Arellano, PE, LS

Public Works Director

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1088-acf2022-ADJSZFFiVTUELAiy.pdf>

Original File Name: 2023.04.07\_El Cajon CARB Letter.pdf

Date and Time Comment Was Submitted: 2023-04-07 18:04:49

No Duplicates.

## **Comment 167 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: David

Last Name: Pérez Tejada

Email Address: dperez@baja.gob.mx

Affiliation: State government of Baja California

Subject: Proposed considerations to CARB's ZEV regulations

Comment:

On behalf of the State Government of Baja California, we would like to respectfully submit the following considerations to the Zero Emissions Program proposed by the California Air Resources Board:

- Pause the implementation of proposed regulations until studies and reports that will identify critical infrastructure that would guarantee the success of the transition to ZEV and its impact to integrated, bilateral supply chains. These include:
  - SANDAG CTC
  - Senate Bill 671

### Grants

- We appreciate the opportunities that existing grants present, however, they are not enough to support companies in purchasing electric trucks or build necessary infrastructure. It is practically impossible for small or medium-sized companies to cover current market costs.
- The trucking companies are currently required to cover all costs upfront and, once it is all done, request a reimbursement. Reimbursement programs may return up to 80% of infrastructure building costs at best.
- Other grants are offered to communities in high contamination zones. Unfortunately, the San Diego map has not been updated and communities such as Otay Mesa, where the great majority of transportation companies are located, is not considered a high contamination zone.

- Even though we have established negotiations with the NADBANK, the Mexican Government has not implemented similar regulations nor access to grants. Without financial support, the Baja California State Government is unable to provide the essential tools for trucking companies in order for them to comply with the zero-emission vehicle program. As a Binational Megaregion, "high priority" regulations impact most Mexican trucking companies which don't have access to grants provided by the State of California. In addition, importation costs and trade tariffs yet to be determined for ZE vehicles purchased abroad further increased the cost of trucks, not to mention the existing challenge of Mexican regulations mandate local-established companies must acquire these vehicles within the country for fiscal deduction.

### Drayage

- Several trucking companies established in Mexico have already acquired trucks operated by natural gas to comply with the "Truck & Bus" rule, but with an estimated delivery date of November 2024,

they will be unable to register these previously acquired trucks to access California maritime ports under proposed regulations. Exceptions currently state a "vehicle delay", but only got ZE vehicles not the natural gas ones.

#### Weight

- ZE Trucks would weigh around 5,000 to 7,000lbs more than diesel ones. The weight of batteries would roughly reduce cargo truck capacity by 33%. This would translate into 33% additional trucks on highways needed to transport the same loads and 33% increase on transportation costs for industry and/or final consumers.
- As the price of transportation raises, so will the merchandise. Making an inflation cycle that affects everyone.
- Lastly, having more trucks on the road will somehow still create pollution and is not as efficient.

#### Exemptions

- Regarding industry and the cross-border economy, we request that trucks that travel from Mexico with a final destination to US states (in-transit) other than California, are exempt due to their limited time operations across this state.
- Current regulations proposed by CARB allow for an exception of 5 days per year, however, this is not enough considering the number of trucks that travel across the busiest border.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 18:33:12

No Duplicates.

## **Comment 168 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: David

Last Name: Pérez Tejada

Email Address: dperez@baja.gob.mx

Affiliation: State government of Baja California

Subject: Proposed considerations to CARB's ZEV regulations

Comment:

On behalf of the State Government of Baja California, we would like to respectfully submit the following considerations to the Zero Emissions Program proposed by the California Air Resources Board:

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- As the price of transportation raises, so will the merchandise. Making an inflation cycle that affects everyone.
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- Regarding industry and the cross-border economy, we request that trucks that travel from Mexico with a final destination to US states (in-transit) other than California, are exempt due to their limited time operations across this state.
- Current regulations proposed by CARB allow for an exception of 5 days per year, however, this is not enough considering the number of trucks that travel across the busiest border.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-04-07 18:33:12

No Duplicates.



## **Comment 169 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Christine

Last Name: Wolfe

Email Address: christinew@cceb.org

Affiliation: CCEEB

Subject: CCEEB Comments on ACF 15-Day Package

Comment:

Please find attached CCEEB's comments on the 15-Day Changes to the Proposed Advanced Clean Fleets Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1136-acf2022-BzVcagQ3UjJReQMz.pdf>

Original File Name: 2023.04.07 CCEEB Comments ACF 15-day Package.pdf

Date and Time Comment Was Submitted: 2023-04-07 18:51:56

No Duplicates.

## **Comment 170 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Madison

Last Name: Vander Klay

Email Address: mvanderklay@svlg.org

Affiliation: Silicon Valley Leadership Group

Subject: SVLG Comments on Proposed Advanced Clean Fleets Regulations

Comment:

Please see the attached for Silicon Valley Leadership Group's comments on Advanced Clean Fleet regulations.

Thank you

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1167-acf2022-VSZdLQNuAjYAWQdk.pdf>

Original File Name: SVLG comments for ACF April 5.23.pdf

Date and Time Comment Was Submitted: 2023-04-07 19:21:16

No Duplicates.

## **Comment 171 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Jake

Last Name: Jacoby

Email Address: jjacoby@trala.org

Affiliation: Truck Renting & Leasing Association

Subject: TRALA Comments on Advanced Clean Fleets Rule

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1203-acf2022-UiZdKVIyUW4BZIJ8.pdf>

Original File Name: TRALA.ACF.040723.pdf

Date and Time Comment Was Submitted: 2023-04-07 19:53:35

No Duplicates.

## **Comment 172 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Joe  
Last Name: Dalum  
Email Address: joe.dalum@odyne.com  
Affiliation: Odyne Systems, LLC

Subject: Odyne Comments on Advanced Clean Fleets Rule  
Comment:

Attached please find Odyne Systems, LLC comments on CARB's proposed 15-day revisions to the draft Advanced Clean Fleet regulations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1343-acf2022-VDsGZFEpUG1RMlcI.pdf>

Original File Name: Odyne Comments ACF 230407 final.pdf

Date and Time Comment Was Submitted: 2023-04-07 21:59:41

No Duplicates.

## **Comment 173 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: Pacific Gas & Electric

Subject: PG&E Comments on 15-Day Changes

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1344-acf2022-UyNcPQFIVFgFMgM2.pdf>

Original File Name: PGE 15-Day Comments on ACF\_040723.pdf

Date and Time Comment Was Submitted: 2023-04-07 22:23:50

No Duplicates.

## **Comment 174 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Todd

Last Name: Campbell

Email Address: todd.campbell@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: CLNE Comments on the Advanced Clean Fleets regulation 15-Day  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1345-acf2022-VTYGbFE+VGJQCVdm.pdf>

Original File Name: CLNE 15-day Comment Ltr 4.6.23.pdf

Date and Time Comment Was Submitted: 2023-04-07 22:40:01

No Duplicates.

## **Comment 175 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Garen  
Last Name: Kazanjian  
Email Address: gkazanjian@recology.com  
Affiliation: Recology, Inc.

Subject: ACF Comments  
Comment:

April 7, 2023

Mr. Paul Arneja  
Air Resources Engineer  
California Air Resources Board  
Submitted electronically via  
<https://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Comments on March 23, 2023 Draft of Advanced Clean Fleets Regulation

Dear Paul,

Thank you for the opportunity to comment on the Proposed 15-day Changes to the Proposed Regulation Order - Advanced Clean Fleets Regulation, issued on March 23, 2023. I am writing on behalf of Recology, one of the leading recycling, composting and waste collection companies in the state.

Recology and its over 25 California operating subsidiaries operate a fleet of over 2,000 vehicles in the state that will be covered by the regulation. We service over 80 communities throughout Northern California, ranging from major cities and suburban communities to remote rural areas. We trace our roots back more than 100 years.

Recology is proud to have been at the forefront of the state's push towards diversion of solid waste from landfill. In partnership with the City of San Francisco, we pioneered the first 3-bin system in any major U.S. city, and helped the City achieve the highest diversion rate of any major U.S. city. We have actively supported the cities and counties we work with in meeting the state's recycling mandates, including AB 939, AB 1826, AB 341, and SB 1383. Through our 5 California compost facilities, we are also one of the state's largest commercial composters.

Consistent with our mission, Recology fully supports CARB's goal of transitioning all heavy duty vehicles to ZEVs as a means to aggressively reduce greenhouse gases. We have been piloting this technology since 2019 and are working with manufacturers in testing and developing ZEVs that meet the needs of our industry. Our fleet is powered by 90% renewable or alternative fuel.

We believe the goal of fleet electrification is best served through fair, workable regulation that thoughtfully engages with the challenges industries face in transforming their fleets and

businesses and making the necessary investments. We want to see a successful Advanced Clean Fleets Regulation that drives the state towards a zero-emission future. We offer the following comments in that spirit.

#### Waste and Wastewater Fleet Option

The "waste fleet" definition only applies to fleet owners whose activities support "processing of diverted in-state organic waste to produce biomethane." For consistency with SB 1383, the definition should be broadened to include any type of organics processing that CalRecycle recognizes as diversion. SB 1383 does not express a preference for biomethane, and approves several other methods of diverting organics, including composting. Composting is also the preferred method for most jurisdictions we work with. Compost produced by Recology is procured by jurisdictions as part of their strategy to comply with SB 1383's procurement mandates and by California farmers seeking to incorporate sustainable and less water-intensive practices into their operations. Limiting the definition of "waste fleet" to include only those supporting biomethane production effectively penalizes companies and jurisdictions that invested in composting, and is therefore inconsistent with the state's policies related to organics recovery.

The "waste fleet" definition only applies if the fleet owner "contracts" with a "municipality." However, many jurisdictions including San Francisco do not have contracts with their solid waste collectors, instead authorizing them through a license or permit system. Moreover, many solid waste collection contracts are not entered into by municipalities, but rather by counties and solid waste agencies (JPAs). The "waste fleet" definition should be modified to better reflect the many ways that jurisdictions choose to engage their solid waste collectors.

The "waste fleet" definition only applies if the organic waste is collected pursuant to a contract with a minimum 10-year term, or 3 years with automatic renewal. We suggest deleting this requirement since it appears arbitrary and unnecessary to fulfill the purpose of the exemption. For example, it is unclear why a franchise agreement with a 7-year term, or a 1-year evergreen provision, should not receive the exemption, on the understanding that the exemption would only apply as long as the contract is in effect.

In light of the above comments, we suggest revising the "waste fleet" definition to read as follows:

"'Waste fleet' means the vehicles owned and operated by a fleet owner that is contracted, licensed or permitted by a city, county, joint powers authority, or other local governmental agency that is mandated to support the hauling, transfer, and processing of diverted in-state organic waste via franchise agreement, other contract, license or permit."

In 2015.2(e)(2), "garbage vehicle configurations" should be changed to "waste fleet vehicle configurations," for consistency with the "waste fleet" definition.

#### Daily Usage Exemption

This exemption is only available if the fleet owner demonstrates that "no new BEV is available to purchase that can meet the demonstrated daily usage needs of any existing vehicles of the same configuration in the fleet." However, "fleet" means vehicles



"operated under [] common ownership or control." For many companies, their "fleet" will consist of all the vehicles they operate throughout the state. This regulatory structure creates severe issues for companies that operate in varying operating environments.

First, the regulation requires a comparison of apples to oranges. A refuse collection vehicle that operates in a sparse, hilly rural area requires more battery power than the same vehicle operated in a dense, flat urban area. There may be a BEV that meets the daily usage needs of the urban vehicle but not the rural vehicle. Yet the exemption counts these vehicles the same if they have the same configuration. The exemption should be modified so that only configurations in similar operating environments are compared.

Second, the regulation penalizes fleet owners that operate vehicles in diverse environments. Continuing the above example, suppose a fleet owner needs to replace a rural vehicle, but it also operates an urban vehicle hundreds of miles away. If there is a BEV that meets the daily usage needs of the urban vehicle but not the rural vehicle, the fleet owner would be unable to obtain the exemption for the rural vehicle, whereas a different fleet owner that only operates in rural areas would be able to obtain the exemption. The fact that the fleet owner could conceivably replace the urban vehicle instead is no answer, because the fleet owner might not need to replace that vehicle. The exemption should be modified so that the comparison is done for vehicles operating out of the same yard or the same limited geographic area.

Third, the regulation requires fleet owners to submit an unnecessary amount of documentation. The exemption requires submission of data "for all ICE vehicles of the same weight class and configuration of the vehicle to be replaced." If the fleet owner has hundreds of vehicles of the same configuration throughout the state, the fleet owner would have to gather and submit data on all these vehicles in order to get an exemption for one vehicle. And as stated above, much of the data would be irrelevant because it would apply to vehicles in different operating environments. A representative sample of vehicles from a similar operating environment should suffice.

The daily usage exemption is only available to fleet owners whose fleets already have at least 10% ZEVs. This seems inconsistent with the milestone approach in §2015.2(a), which does not require 10% ZEVs until a later date. The premise of the daily usage exemption is that there is no available BEV that meets the fleet owner's daily usage requirements. A fleet owner should not be required to purchase BEVs that do not meet its daily usage requirements just to meet the 10% threshold for this exemption.

The daily usage exemption is unavailable for non-tractor Class 8 vehicles if a BEV exists in the same configuration with an energy capacity of 450 kilowatt-hours or more. This may not be enough for refuse collection vehicles, with their powerful lifting systems, frequent stops, and heavy payloads. Whether a BEV is equivalent should be based on its actual performance for its intended use, not on an arbitrary energy capacity metric.

If the fleet owner wishes to demonstrate that no BEV can handle the daily assignments of the equivalent ICE vehicle, the fleet owner must submit data "from BEVs of the same configuration already operated on similar daily assignments." But if there is no

equivalent BEV, it's unclear how the fleet owner could obtain such information. It would be illogical to require the fleet owner to purchase an unsatisfactory BEV in order to prove that it's unsatisfactory. The fleet owner should be allowed to submit other kinds of data (e.g. manufacturer specifications) to substantiate the lack of equivalency.

2015.3(b)(4) states that the daily usage exemption is categorically unavailable and will not be granted if certain mileage or energy use criteria are met. This bright-line test seems overly narrow. For a refuse collection vehicle, the hours it can operate between charges, and the payload it can carry while remaining within legal weight limits, are at least if not more significant than mileage or energy use. Equivalency should be based on the BEV's actual performance for its intended use in the specific operating environment in which it will be used, and not reduced to an oversimplified numerical comparison.

#### Purchase Exemption

The standard for applying the Purchase Exemption is that there is no available ZEV "configuration" that serves the same "primary intended function" as an ICE vehicle. This standard is too broad. A ZEV refuse collection vehicle that can only operate 5 hours between charges and carry a 7-ton payload is in no meaningful way "equivalent" to an ICE vehicle that can operate 10 hours without refueling and carry a 10-ton payload. If these vehicles were deemed equivalent, it would necessitate seismic shifts throughout our industry, including increasing the number of vehicles and drivers, increasing yard space, etc. These in turn would increase waste collection rates throughout the state. As stated above, equivalency should be based on a vehicle's actual performance for its intended use in the same operating environment as a comparable ICE vehicle.

The regulation should state that the Purchase Exemption lasts for the useful life of the vehicle, so that it's clear that the exemption does not expire when the vehicle configuration is removed from the Purchase Exemption List. A fleet owner that relies on the Purchase Exemption should not be penalized for subsequent improvements in technology over which the fleet owner had no control.

2015.3(e)(2)(G) allows fleet owners to continue to rely on the Purchase Exemption for 180 days after a vehicle is removed from the Purchase Exemption List. In our business, funding for the transition to ZEVs will need to be negotiated into the franchise agreements and other arrangements with jurisdictions pursuant to which we provide services. These negotiations can often take years. If we presented a cost proposal to a jurisdiction based on the expected availability of the Purchase Exemption, and then were forced to revise the cost proposal to due to the announced expiration of the Purchase Exemption, the additional expense would trigger substantial renegotiation that could take more than 6 months to complete. We suggest changing the time period to 1 year.

We suggest clarifying that the specific configurations listed in 2015.3(e)(1)(A) cannot be removed from the Purchase Exemption List before January 1, 2025, and therefore fleet owners can continue to rely on the Purchase Exemption for at least 180 days (or 1 year, as suggested above) beyond that date. Consistent with earlier comments, when CARB decides to remove a vehicle from the list, it should do so only if the ZEV vehicle can perform to the same

standards as a comparable ICE vehicle in the same operating environment.

In the definition of "configuration," we suggest clarifying that each of the specific vehicle types listed in 2015.3(e)(1)(A) is a "configuration," so that it's clear (for example) that "front-loader refuse compactor truck" is a "configuration," not an umbrella category under which many different "configurations" may exist.

#### Other Provisions

The regulation generally treats FCEVs and BEVs as interchangeable (both are ZEVs). It also states that certain exemptions are unavailable if an equivalent ZEV exists. This could create unintended outcomes for fleet owners. In reality, fleet owners need to decide whether to install electrical charging equipment or hydrogen fueling equipment at their yards. Suppose a fleet owner plans to adopt a BEV fleet at a particular site and install the necessary charging equipment, but needs to temporarily rely on the Purchase Exemption for a particular configuration. Suppose further that, under the Purchase Exemption, CARB determines there is an equivalent FCEV available for that configuration, but not an equivalent BEV. In that scenario, the fleet owner would be required to purchase the FCEV, even though it lacks the necessary infrastructure and has no long-term intention to use FCEVs. The regulation should be revised to eliminate this problem.

Several exemptions including the Daily Usage Exemption, Purchase Exemption, and Infrastructure Delay Extension appear to apply only to "replacement" vehicles. This fails to take into account that fleet owners may need to expand their fleets as demand for their services increases, or to meet new regulatory mandates such as SB 1383. For example, Recology is continuing to expand the number of collection vehicles in its fleets as it works with jurisdictions to add routes for the collection of source separated organic waste. The exemptions should be modified so that they apply to additional or replacement vehicles.

The Infrastructure Construction Delay Extension only applies to delays occurring after a construction permit is obtained and a construction contract is signed. This does not take into account the substantial delays that can result from the permitting process, which for complicated projects may take years, especially if the project involves environmental impacts. The permitting process is a function of regulatory and local government requirements and processes that are beyond fleet owners' control, and it cannot be assumed that a construction permit will be the only type of permit required. The extension should be modified to include permitting delays.

In 2015.2(a), the example is incorrect because it states that a fleet owner complying with the Milestone Option must have 10% ZEVs within Class 1. We suggest the following rewording: "for example, the Milestone Group 1 percentage is vehicles must comprise at least ten percent of the California fleet each year beginning January 1, 2025 until December 31, 2027."

The Vehicle Delivery Delay Extension and the definition of "vehicle purchase" require "immediate delivery or installation" of the vehicle or body. In our industry, most vehicles are made to order and take a year or longer to manufacture. There is no such thing as "immediate delivery." We suggest revising these provisions to say,

"immediate delivery upon completion."

The Vehicle Delivery Delay Extension does not apply if the purchase agreement is modified for any reason within 1 year of the compliance deadline. This seems like an unnecessary restriction. There are many reasons purchase agreements may need to be modified, including change orders or other business terms. We suggest eliminating this requirement.

\* \* \*

Thank you for considering these comments. If you have any questions, please do not hesitate to contact me at [gkazanjan@recology.com](mailto:gkazanjan@recology.com).

Respectfully,

Garen Kazanjian  
Public Policy & Regulatory Affairs Manager  
Recology

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1347-acf2022-BWQHYIYxVlpWMwdo.docx>

Original File Name: ACF Comment Ltr. 4-7-23.docx

Date and Time Comment Was Submitted: 2023-04-07 22:44:08

No Duplicates.

## **Comment 176 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@ca-rta.org

Affiliation: CA Renewable Transportation Alliance

Subject: CRTA, NGVA Joint Comment Letter on Proposed ACF 15-Day Package  
Comment:

The California Renewable Transportation Alliance (CRTA) and the Natural Gas Vehicles for America (NGVA) appreciate the opportunity to submit these comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1348-acf2022-WjBWPwZuAj8BcwNc.pdf>

Original File Name: Joint ACF 15-Day Comment Letter 040723.pdf

Date and Time Comment Was Submitted: 2023-04-07 23:01:14

No Duplicates.

## **Comment 177 for Advanced Clean Fleets Regulation (acf2022) - 15-1.**

First Name: Laurel

Last Name: Moorhead

Email Address: Non-web submitted comment

Affiliation: Transfer Flow, Inc.

Subject: Transfer Flow, Inc.'s Public Comment on The California Air Resources Board  
Advanced Clean

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-vaporrecovery2023-Uz4BaAZoUHEHaQht.pdf>

Original File Name: moorheadcomment.pdf

Date and Time Comment Was Submitted: 2023-04-12 14:59:24

No Duplicates.